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United States
Department of
Agriculture

**Forest
Service**

Southwestern
Region

July 1986

Public Comments and Forest Service Response to the DEIS, Proposed Coronado National Forest Plan

Volume I

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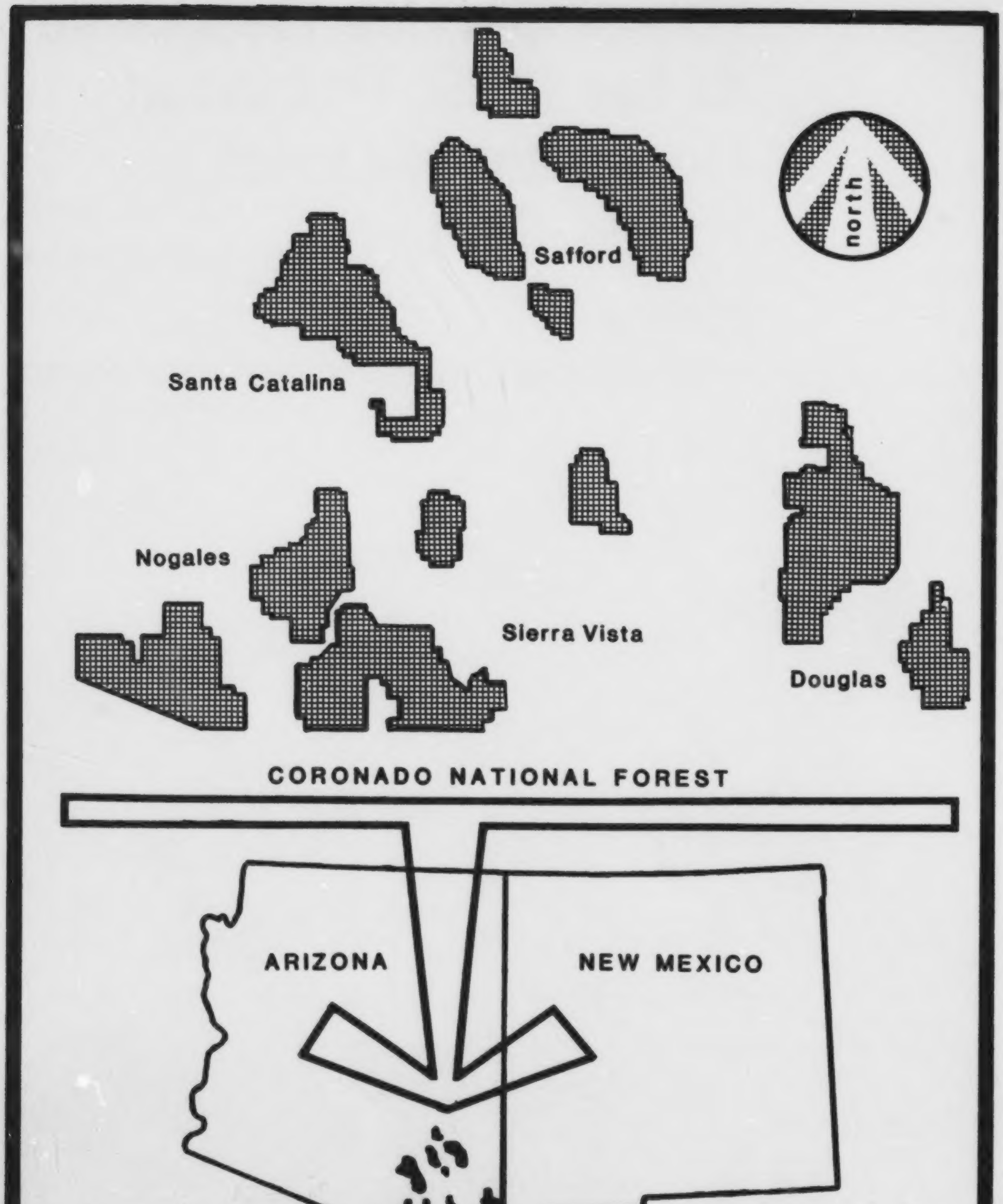
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CORONADO NATIONAL FOREST
ARIZONA
NEW MEXICO

Coronado National Forest

Land and Resource Management Plan
Environmental Impact Statement
Agency Response to Public Comment

Volume I

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Introduction

A Draft Environmental Impact Statement and Proposed Plan were published in December 1982. The public comment period ended in April 1983. The following changes were made to the Proposed Action and alternatives as a result of public comments received at that time.

1. The Proposed Action and all alternatives were revised to achieve a balance of livestock grazing capacity and use within two periods (20 years) or less.

2. The Proposed Action was revised to allow for motorized vehicle use only on roads and trails for the entire Forest.

3. The Proposed Action was revised to recommend a natural history area (zoological area) designation for Guadalupe Canyon.

4. Proposed management direction for the South Fork of Cave Creek was revised to allow public motor vehicle access. The proposed boundary of the zoological-botanical area was also revised to exclude the road, recreation facility, and summer homes.

5. The Proposed Action and all alternatives were revised to display management choices for the proposed Mt. Graham astrophysical area.

This document consisting of Volumes I and II, provides a record of Agency response to public comment received on the Draft Environmental Impact Statement and Coronado National Forest Plan which was published May, 1985. This includes a letter from the U.S. Department of the Interior Fish and Wildlife Service documenting the formal consultation process and biological opinion for threatened and endangered species as required by the Endangered Species Act of 1973 (P.L. 93-205), as amended. The public comment period ended October 11, 1985.

Comments and corresponding responses on the Plan are arranged alphabetically. For most letters of comment, specific points raised have been identified with brackets and a number which corresponds to a number listed with the Agency response.

Some comments were broad in nature and did not address specific points of challenge to the Environmental Impact Statement or Forest Plan. In these instances, the Agency response follows the letter of comment, but is not keyed to specific points within the letter of comment.

Page numbers referenced in the responses correspond with page numbers in the Draft EIS and Draft Plan or Final EIS and Final Plan as appropriate.

In accordance with 40 CFR 1503.4, public comments were treated in the following ways:

1. Defer decision on the proposed Mt. Graham astrophysical area (3500 acres) to the separate EIS being prepared. Comments received on the proposed astrophysical area are being considered in preparation of the separate EIS. A listing of those submitting comments is included in this response document.

2. Revise the Proposed Action and Alternative C to include a wilderness recommendation for the entire (62,000 acre) Mt. Graham Wilderness Study Area.

3. Revise the Proposed Action to eliminate livestock grazing on the Redfield Allotment (Galiuro Mountains).

4. Revise the Proposed Action map to include additional riparian areas inventoried since the 1982 DEIS.

5. Comments offering technical additions and corrections or pointing out inconsistencies were used to revise the final documents.

6. Comments pointing out areas where the DEIS or proposed Plan needed clarification were used to clarify those documents.

7. Comments questioning the analysis or the rationale for decisions were answered in response to the comments.

0014

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

AUG 6 1985

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July 25-85
Queens University Biological Stn.
Elgin, Ontario K0G 1E0
CANADA

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson AZ 85701

Dear Sirs:

Thank you for sending me the Summary of the DEIS for the Coronado National Forest. Please excuse this informal response, but I am currently doing field work in Canada.

1 I have just 2 comments. I favor minimizing the impact of the observatory on Mt. Graham, if it is decided that such an observatory is to be built. (Alternative D). I won't need the Mt. Graham EIS.

2 Second, I *strongly* favor *alternative D* with respect to the proposed zoological-botanical areas. I think it is great that the draft EIS recognizes the desirability of such areas and the unique value of the South Fork of Cave Creek. But the areas protected under the PA are simply inadequate,

3 and the decision to permit grazing to continue sickens me. I know the ranching interests put a great deal of pressure on the Forest Service, but just once it would be great to tell them that there are other things in life besides subsidized cattle feed.

Thanks,

John Alcock

John Alcock, 705 E Loyola Dr, Tempe AZ 85282

Agency response to
John Alcock

1. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as it was for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

2. Zoological and/or botanical areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the Plan, and others were considered as suggested by various respondents.

3. As a matter of principle, we do not believe that it is appropriate to single out Forest Service range permittees as being the sole recipients of a federal "subsidy." Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid by that individual to enjoy those benefits. Another way of expressing this would be to view it as an income or wealth transfer. This kind of income redistribution does not necessarily involve the actual transfer of cash. For example, in the case of a recreation user who pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full actual cost of providing that benefit. Since the source of the Forest Service recreation management funds is the public treasury, it could be said that all recreation users on the National Forest are being subsidized. Viewed from this perspective, almost all of the use and enjoyment derived from the Coronado National Forest could be considered to be a subsidy. This kind of subsidy would include virtually all developed recreation use, dispersed recreation use, skiers, bird watchers, wilderness users, hunters and fishermen, all downstream water users who benefit from watershed management, private property owners who benefit from Forest Service fire protection programs, range permittees, firewood users, anyone who uses a Forest Service road, etc. The potential list of Forest users who could be considered to be the recipients of a subsidy or income transfer is practically endless. Under the existing rules of our society, the public sector provides many such subsidies which touch the lives of all citizens. The ultimate decision of who receives a subsidy and who pays, rests with the elected representatives of the people; in other words, it is a political decision. The U.S. Forest Service, as custodians of public trust lands, operates under authorities granted by the U.S. Congress and is not empowered to make the ultimate decision of who is subsidized and who pays. In summary, the subsidy issue which you raise is indeed a critical issue. However, it should be remembered that range permittees are but one among many National Forest users who receive benefits in excess of the costs necessary to produce and distribute those benefits.

0688

American Fisheries Society
Arizona-New Mexico Chapter

October 7, 1985

Mr. R. B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

The Arizona-New Mexico Chapter of the American Fisheries Society has reviewed the Proposed Coronado National Forest Plan and accompanying Draft Environmental Impact Statement (DEIS) for the Plan.

Our Society concurs with the 14 issues, concerns and opportunities as presented in the Plan. Of course, our primary interest and concern with Forest Service planning involves fisheries resources and riparian management. Our Society advocates the need for fisheries resources to receive equal consideration with competing resources in the planning process and that the value fisheries generate on Forest Service land be recognized and considered with commodity values and production.

Our review of the Coronado's planning documentation resulted in the identification of the following issues or problems:

1 - Economics developed to justify planned actions are biased in favor of commodity production. Values established for both consumptive and nonconsumptive wildlife uses are low and not in agreement with the values in the draft RPA Environmental Statement or with expenditure values listed in the 1980 National Hunting and Fishing Survey.

2 - The Forest is not proposing to balance permitted grazing use with grazing capacity. Permitted use should align with grazing capacity by the end of the second decade.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 8 - 1985
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3 - The Plan does not present a methodology for tracking (monitoring) fish nor predicting fish response to various management decisions. The process of selecting management indicator species needs to be reviewed and the list of species updated. No discussion of minimum viable populations of fish species is provided, nor a discussion of how they will be maintained.

4 - Endangered species must be managed for the recovery of those species. Maintenance of existing habitats, where those habitats provide for only basal populations of listed fishes is unacceptable and contrary to the Endangered Species Act of 1973, as amended.

5 - Riparian area mapping was not updated from the original draft plan. Recovery of riparian areas to a satisfactory or better condition should be accomplished within 30 years, rather than the proposed 50 years.

6 - We found it difficult to track the management prescriptions for any given species through the management activities proposed within the Plan. We believe guidelines established by the National Environmental Policy Act mandate such documentation should be readily understandable by the general public. We feel revisions of the current documentation are required in order to meet these guidelines.

We appreciate the opportunity the review these draft documents, and hope that our comments are of value in developing the final Coronado National Forest Plan.

Sincerely,

Roger Sorensen

Roger K. Sorensen
Vice President

RKS:lea

Agency response to American Fisheries Society

1. General Comment:

   The benefit value assigned to wildlife recreation is too low.

   General Response:

   We do not agree with your contention that the wildlife recreation benefit values are erroneous. We would like to briefly explain the economic "value" concept applied and the actual computation used for the Coronado. Before proceeding, we must acknowledge that there is a great deal of disagreement among the public on the "value" of nonmarketed goods and services. Many of the public comments we have received thus far reflect these differences of opinion and your comments are representative of many from throughout Arizona. The great bulk of the comments such as yours regarding the "too low" or "too high" benefit values results from a misunderstanding concerning the economic theory which underlies the meaning and estimation of "assigned values" in forest planning. The "consumer surplus" theory forms the basis for these value estimates.

   Basic Definition of Economic Value:

   Economic value for recreation used in Forest Planning is measured by the net amount, in excess of their actual expenditures, that consumers are willing to pay for a resource. In conventional economic theory, this value is called "consumer surplus." Net willingness to pay, or consumer surplus, is the standard measure of value in benefit/cost analysis performed by the U.S. Forest Service, the U.S. Army Corps of Engineers, the Bureau of Reclamation, the Soil Conservation Service, the Bureau of Land Management, many State government agencies, and others.

   The most commonly used technique for estimating users' net willingness to pay for recreation is the "Travel Cost Method." A brief description of this technique will be used to illustrate the concept of consumer surplus. The "Travel Cost Method" relies on variations in travel costs of recreationists to trace out a demand curve for a particular type of recreation experience. The demand curve is usually downward sloping and to the right of the origin, depicting an inverse relationship between quantity demanded and price. The total area under the demand curve may be thought of as the total, or maximum, willingness to pay ("total benefit"). In order to arrive at a net benefit value, the consumer's travel costs must be deducted from this total benefit measure. The area under the demand curve, but above actual travel costs, is a measure of net willingness to pay, or consumer surplus. As can be seen, consumers' actual expenditures do play a role in this estimation process; however, they are a part of the "cost" side of the equation, not the net "benefit" total.

   Based upon this kind of valuation concept, the use of actual expenditures by hunters and fishermen is not appropriate as benefit values for valuation of wildlife. Expenditures are useful only for measuring the effect of impact on local economies of some resource management action. The reason for not attributing the indirect spending impact as part of the value of recreation is that the recreationist would have spent his money doing something else (or simply saved it), with an equal indirect impact somewhere else. The impact of the recreationist's expenditure on the local community is thus a transfer of spending from one place to another rather than a net addition of value. Use of gross expenditures as a measure of value would actually lead to maximizing inefficiency instead of efficiency. That is, if gross expenditures were used as a measure of value, new recreation sites would be located as far away from population centers as possible, so that people would have to incur large expenditures to get there.

The following brief list of references provide additional detail on this concept of "economic value."

Agency response to
American Fisheries
(continued)

Brown, Thomas C. 1982. Monetary Valuation of Timber, Forage and Water Yields from Public Forest Lands. U. S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-95.

__________. 1984. The Concept of Value in Resource Allocation. Land Economics 60(3): 231-246.

Donnelly, Dennis M., John B. Loomis, Cindy F. Sorg, and Louis J. Nelson. 1985. Net Economic Value of Recreational Steelhead Fishing in Idaho. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-9.

Hansen, Christopher S. 1977. A report on the Value of Wildlife. U.S. Department of Agriculture, Forest Service, Intermountain Region, Ogden, Utah.

Martin, William E., Russell L. Gum, and Arthur H. Smith. 1974. The Demand For and Value of Hunting, Fishing, and General Rural Outdoor Recreation in Arizona. Technical Bulletin 211. The Agricultural Experiment Station, University of Arizona, Tucson.

Rosenthal, Donald H., John B. Loomis, and George L. Peterson. 1984. The Travel Cost Model: Concepts and Applications. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-107.

Ward, Frank A. 1982. The Demand For and Value of Recreational Use of Water in Southeastern New Mexico. Research Report 465. The Agricultural Experiment Station, New Mexico State University, Las Cruces.

In summary, the belief that expenditures are equivalent to benefit values used in economic efficiency analysis is not supported by conventional economic theory. The "assigned" values used in Forest planning are not based on total dollars spent for travel expenses, food, lodging, equipment, etc. The economic value of an RVD is based upon the consumer's willingness to pay for the RVD, over and above his round trip costs of experiencing the RVD.

Calculation of Benefit Value for Coronado:

The $16.90 value for hunting and fishing used for the Coronado is the result of a calculated weighted average using established RPA benefit values for big game use, small game use, and resident fishing use. The nongame wildlife use value of $22.76 is taken directly from the RPA estimates. The benefit values used are those in use for the 1985 RPA Program as of October, 1983. The use of these benefit values is mandated by National Forest Service policy. The weights used are taken from the 1980 Arizona Game and Fish Department data. The base data and calculations are shown below (the one cent difference in totals is apparently due to rounding differences).

	1985 RPA Benefit Value (Jan. 1, 1982 $)	Benefit Value (4th 1980 $)	Percent of Use	Weighted Values
Big Game	30	27.31	19.2	5.24
Small Game	18	16.39	46.1	7.56
Fishing	13	11.85	34.7	4.11
			Weighted Benefit Value	16.91

The nongame wildlife use uses the RPA benefit value of $22.76 ($25 in January 1, 1982 dollars). The overall result of using these benefit values can be calculated using the total wildlife outputs (Table 9, p.44, DEIS) and the total wildlife benefits (Table 11, p.47, DEIS). For the Proposed Action alternative, the average wildlife benefit value is $18.52 in 1980, 4th Quarter Dollars. Other alternatives are only slightly different.

An "expenditures approach" would yield much higher values for wildlife recreation; however, this approach is theoretically and methodologically incorrect for uses such as forest planning.

Summary Conclusions:

In summary, our review of the procedures and actual values used to estimate the wildlife recreation benefit values for the Coronado National Forest does not indicate a need to revise these values. While it is true that the benefit values used for the Coronado are based on the established 1985 RPA Program benefit values, no convincing evidence has been offered which would indicate that these values are unreasonable or inappropriate. The procedures and values used by the Coronado National Forest are consistent with the direction used throughout the National Forest System.

2. All alternatives, including the Proposed Plan, will bring about a balance between grazing capacity and permitted livestock use within two decades of implementation.

3. Although the Forest Plan suggests methods to monitor responses of wildlife populations and habitat, the primary purpose is to identify species and activities to be monitored and the points at which management direction needs to be evaluated and changed if necessary. Monitoring methods listed are those currently available to us. As new methodology is developed, including habitat capability models, we plan to adopt any that meet the needs and are efficient.

   Early in the Coronado N.F. planning process all interested wildlife managers were invited to participate in the selection of indicator species. Participants in this process included representatives of Arizona Game and Fish, U.S. Fish and Wildlife Service, the University of Arizona, Tucson Audubon Society, the Nature Conservancy, and Forest Service Wildlife Biologists. They agreed on a list that seemed appropriate at the time.

   The list of management indicator species will be reviewed and updated concurrent with the wildlife monitoring and evaluation. Some attempt was made to define minimum viable populations in terms of defining currently occupied habitat. For many species, in particular fish, habitat and population data was limited.

4. We agree. In fact, one of the wildlife goals on page 23 of the Draft Forest Plan states: "Improve the habitat of and the protection for local populations of Threatened and Endangered species to meet the goals of the Endangered Species Act of 1973." We have reviewed objectives for each specific management area to insure the word improve is used relative to threatened and endangered species.

5. Maps for the Final Forest Plan have been updated to include additional riparian areas that have been identified and field checked since the initial Draft Plan. Any additional riparian areas that have not been identified, verified and mapped at this time will be added later. Implementation direction on page 39 of the Draft Plan provides for applying the proper management direction in instances where mapping is inadequate.

   The length of time necessary before 100 percent of the riparian area will be in satisfactory condition is due to the time needed for woody riparian vegetation to recover.

   A riparian area is considered satisfactory when at least 60 percent of the woody plants are in three or more species; three age classes are represented with at least 10 percent in sprouts and seedlings; and at least 60 percent of natural cover is maintained. Since riparian areas that are now unsatisfactory usually are lacking the young age classes of woody vegetation, it will take about 30 years to establish the two younger age classes once uses are controlled.

Agency response to
American Fisheries
Society
(continued)

The Forest Plan prescribes that at least 25 percent of the riparian area will be in satisfactory condition by the end of the Second Period and that the percentage in satisfactory condition will increase each year. The statement that 100 percent will be satisfactory by the end of Period 5 does not mean we will wait until then to make improvements.

6. Objectives, standards, and guidelines for managing wildlife habitat have been moved from Appendix C of the Draft Plan to the appropriate management area prescriptions. This will make it easier to understand how the wildlife resource will be managed in relation to the other resources and uses. Some objectives, standards, and guidelines are specific to individual species. However, the majority are keyed to activities that affect wildlife habitat in general. Detailed management prescriptions for individual wildlife species are more appropriate at the project level and will be developed as needed through site specific environmental analysis.

American
Museum of
Natural
History

THE SOUTHWESTERN RESEARCH STATION

0200

August 23, 1985

Bernard H. Brunner
Coronado National Forest
RR # 1, Box 228R
Douglas, AZ 85607

Dear Bud:

Sorry we missed the August 6, 1985 Coronado National Forest Plan meeting in Portal. Somehow we had August 7 noted on our calendar.

1 I still object strongly to item 8 (p. 84) of the Proposed Coronado National Forest Plan for South Fork of Cave Creek Canyon, management area 14. Since plant collecting never has been a problem I see no value in adding another regulation to your overburdened staff. You expressed concern for roadside flower picking due to heavy use of the area by naturalists. Nervertheless your plan specifically exempts roadside and picnic areas(item 5; page 84) from this protection. These areas come under the no protection regulations of management area 3A. Before I agree to the permit requirement for researchers I'd like to know what restrictions will be involved in the permits and how they will be obtained. Again I strongly suggest that you simply drop this provision (item 8; page 84) from the plan.

2 In regard to item 7 (p. 84), perhaps the discharge of firearms should be prohibited except during hunting seasons and then only for holders of valid state hunting licenses.

3 In addition, I do not see any plans to phase out the summer homes in South Fork of Cave Creek Canyon.

Sincerely yours,

Vince Roth

Vincent D. Roth
Resident Director

Wade C. Sherbrooke

Wade C. Sherbrooke
Assistant Resident Director

VDR/wcs

cc Tippeconnic

Agency response to
American Museum of
Natural History
Southwestern
Research Station

1. The plant collection policy applies to Management Area 14 because of the special emphasis placed on management of flora as well as fauna. The "exempted" areas along the road and recreation site are minimal in size and are already impacted by the facilities. Our intent is to make permit requirements and availability simple. The Plan has been revised to include more detailed guidelines on issuing plant collection permits.

2. At this time there is no need to specifically prohibit the discharge of firearms. Enforcement of current State law regarding use of firearms should be sufficient to provide Forest user safety and protect wildlife resources. We will be monitoring this activity and make appropriate changes as necessary.

3. There are no plans to phase out summer homes in the South Fork of Cave Creek Canyon. The two existing summer homes have been authorized by special use permit. The Forest Plan provides for continuation of the permits for the Plan period (10 - 15 years). These summer homes and others on the Forest may be subjected to a separate tenure analysis to determine whether the permits should be continued or phased out based on a higher priority need. However, permit holders must be given at least ten years notice of pending phase outs.

ARIZONA DEPARTMENT OF TRANSPORTATION

HIGHWAYS DIVISION — DISTRICT 2
Highway 70 East — Telephone (602) 428-5470
P.O. Box 711 Safford, Arizona 85548

BRUCE BABBITT
Governor
CHARLES L. MILLER
Director

W.O. FORD
State Engineer

0193

August 22, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 26 1985
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United States Department of Agriculture
Forest Service, Coronado National Forest
FB #42
300 West Congress
Tucson, Arizona 85701

Dear Sir:

Subject: 1920
Draft Environmental Impact Statement
and Proposed Coronado National Forest
Plan

This office has reviewed the Proposed Action and five alternatives for a Land and Resource Management Plan for the Coronado National Forest.

More specifically, we would like to address the Transportation System on the Coronado National Forest.

The Arizona Department of Transportation would like to consider paving the balance of State Route 366 (FH-34) along the existing alignment from Shannon to Columbine, as recreational use appears to be increasing. This would have a multiple benefit, as there would be less dust, increased safety, soil and water resources would be enhanced by reducing erosion and sedimentation, and less maintenance would be required.

The other highway the Arizona Department of Transportation is considering upgrading is State Route 83. The work would entail surfacing the unpaved section between Sonoita and Parker Canyon Lake.

It would be appreciated, if these items are addressed in the EIS scheduled for October.

Sincerely,

Fred Sindel
FRED SINDEL
Safford Area Engineer

FS/sw
cc: Eugene F. Ireland

Agency response to Arizona Department of Transportation District 2	Your proposals to pave portions of State Routes 366 and 83 are project specific and will need to be considered in a separate environmental analysis.

0706

ARIZONA DEPARTMENT OF TRANSPORTATION
HIGHWAYS DIVISION
206 South Seventeenth Avenue Phoenix, Arizona 85007

BRUCE BABBITT
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October 2, 1985

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R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Re: DEIS for the Proposed Coronado
National Forest Plan

Dear Mr. Tippeconnic:

Thank you for the opportunity to comment on the Proposed Coronado National Forest Plan. The Proposed Action appears to nicely balance the varied demands on the National Forest resources.

State Highway System involvement is relatively limited within the Coronado as much of the National Forest is composed of "sky islands" with few paved roads. Portions of State Route 366, 289, 266, 92, 83 and 82 are within or adjacent to Coronado National Forest lands. No construction projects are identified in the Arizona Department of Transportation 5-Year Highway Construction Program (1986-90) for segments of state highway within the Coronado. Two minor projects are scheduled for roadway adjacent to the Forest; Pena Blanca Traffic Interchange improvement and Fort Grant Road seal coat.

Two segments of State Route 83 pass through proposed Unique Resource Areas, Turkey Creek in the Sierra Vista Ranger District and Barrel Canyon in the Nogales Ranger District. ADOT will pay special attention to future projects that may affect those areas. We look forward to continued coordination with the Coronado National Forest.

Very truly yours,

PHILIP A. SHUCET, Manager
Environmental Planning Services

PAS:MRD:sl

HIGHWAYS • AERONAUTICS • MOTOR VEHICLE • PUBLIC TRANSIT • ADMINISTRATIVE SERVICES • TRANSPORTATION PLANNING

**Agency response to
Arizona Department
of Transportation
Highways Division**

Thank you for taking the time to review the Proposed Coronado National Forest Plan relative to management of the State Highway System. We appreciate your cooperation in recognizing and maintaining the unique resources of the Forest.

BRUCE BABBITT, *Governor*

Commissioners:
CURTIS A. JENNINGS, Scottsdale, Chairman
W. LINN MONTGOMERY, Flagstaff
FRED S. BAKER, Elgin
LARRY D. ADAMS, Bullhead City
FRANCES W. WERNER, Tucson

Director
BUD BRISTOW

Assistant Director, Services
ROGER J. GRUENEWALD

Assistant Director, Operations
DUANE L. SHROUFE

0722

ARIZONA GAME & FISH DEPARTMENT

2222 West Greenway Road Phoenix, Arizona 85023 942-3000

October 21, 1985

Mr. Robert B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

The Arizona Game and Fish Department has reviewed the Proposed Coronado National Forest Plan and accompanying Draft Environmental Impact Statement (DEIS) for the Plan. We believe that this draft of the Proposed Forest Plan represents a significant improvement over the original draft released early in 1983.

Our Department concurs with the 14 issues, concerns and opportunities as presented in the Plan. Of course, our primary interest and concern with Forest Service planning involves fish and wildlife resources. Therein, we have advocated, and continue to advocate, the need for fish and wildlife resources to receive equal consideration with other resources in the planning process and that the value that fish and wildlife resources generate on National Forest lands be recognized and considered with commodity values and production.

Our review of the Coronado's planning documentation resulted in the identification of the following issues or problems:

- Economics developed to justify planned actions are biased in favor of commodity production. Values established for both consumptive and nonconsumptive wildlife uses are low and not in agreement with the values in the draft RPA Environmental Statement or with expenditure values listed in the 1980 National Hunting and Fishing Survey.

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- The Plan does not present a methodology for tracking (monitoring) wildlife nor predicting wildlife response to various management decisions. The process of selecting management indicator species needs to be reviewed and the list of species updated. No discussion of minimum viable populations of wildlife species is provided, nor a discussion of how they will be maintained.

- Public access was not adequately treated, nor were there strategies developed to resolve the issue.

- Riparian area mapping was not updated from the original draft plan. Recovery of riparian areas to a satisfactory or better condition should be accomplished within 30 years, rather than the proposed 50 years.

- Fuelwood harvest proposed under the Plan does not reflect recently established management criteria involving Integrated Stand Management or old growth concepts. The proposed timber management should emphasize the stated objective for all suitable areas that wood harvest will be managed to meet wildlife, recreation, and visual goals.

- The Plan does not rectify problems in law enforcement. Laxity continues in pursuing invalid mineral claims, where squatters are permitted to remain on forest lands, to the detriment of natural resources.

The Department's specific comments for the Proposed Forest Plan and DEIS are included as attachments to this letter.

We appreciate the opportunity the review these draft documents, and hope that our comments are of value in developing the final Coronado National Forest Plan.

Sincerely,

Bud Bristow

Bud Bristow
Director

BB:RKW:lea

cc: Arizona Game and Fish Commission

Arizona Game and Fish Department

Review of Coronado National Forest

Draft Forest Plan

General Comments

1 The Department found it difficult to track the management prescriptions for any given species through the maze of activities proposed in the Plan. The inventory process that established the present nongame resource base of the plan does not follow FSM 2621.3 and report the amount, condition, and distribution of key habitats for Management Indicator Species (MIS). Likewise, there is no discussion of minimum viable populations for the unique and diverse wildlife of the Coronado. This discussion is mandated by FSM 2621.2, and should address how a minimum viable population is determined and management requirements to maintain this population level.

Specific Comments

Page 5, Overview

2 Please include literature citations for "RPA Program" and "Regional Guide".

Page 9, Table 1

3 We recommend the addition of footnotes that define MAUM, MRVD, MCF, MBF and MAcFt. The glossary of terms is only in the DEIS. Terminology in the plan should be defined within the document.

4 Please explain the 348 and 408 figures for grazing capacity "supply". The maximized range and RPA benchmarks in Table 9 of the DEIS (page 44) are 348 and 406 for capacity and 357 - 406 for permitted use. Those figures do not represent "supply" of anything, as they are achieved without multiple-use considerations or monetary constraints. The same criticism applies for all other headings. We believe the column should be relabled "maximum benchmark outputs".

Page 11, Paragraph 5

5 We recommend the deletion of this paragraph, as the Mt. Graham astrophysical analysis will be addressed in a separate EIS.

Page 12, Wilderness

6 Fishing is an activity in some of the wilderness or proposed wilderness areas.

Page 13, Wildlife and Fish

7 We recommend the deletion of the paragraph about management indicator species. The process used to select many of the species is no longer valid, based upon the new Forest Regional direction to develop wildlife habitat coefficients for management indicator species.

8 Conclusion point number 5 states the goal to "... maintain the minimum viable population of management indicator species". About 25% of the Indicator Species are Game Species, and this is not an acceptable goal for game species. Generally, the Coronado Forest should maintain much more than minimum viable population for fish and wildlife.

Page 16, Timber and Firewood, Expected Future Condition

9 The second paragraph states an objective to "... support local dependent logging and lumber industries." and "...encourage and support new fuelwood industries." There is no discussion within the DEIS that evaluates the impacts of such activities. At first glance, the encouragement and support of fuelwood and lumber industries would seem to be at conflict with the next paragraph, which says wood harvest will be used to "...meet recreation, visual, and wildlife goals."

Page 23, Mission

10 We believe the last sentence should read "Management programs are to be oriented to maintain cultural values, recreational opportunities and wildlife habitats". It is our opinion that cultural values would include "rural economics" as well as urban cultural orientation.

Page 23, Goals

11 The Plan's goal statement C for wildlife and fish currently does not have nongame input, since Arizona's Nongame Strategic Plan is not completed. There should be a provision to incorporate this strategic plan when it is finalized. The statement that diversity will be preserved through habitat management should probably be preceded by a statement that reveals the present lack of information on exact habitat requirements of MIS, and contains the sub-goal of more research on MIS ecological requirements, especially nongame and threatened/endangered MIS.

Page 24, Protection (P)

12 We recommend the addition of the following goal: Cooperate with state and Federal law enforcement agencies to protect wildlife resources as required by the Endangered Species Act, National Environmental Policy Act, and State Wildlife and Fish regulations.

Page 27, Table 8

13 We have been unable to determine a proposed site for the Redington and Italian Trap Picnic Areas. The Italian Trap area is adjacent to the Rincon Wilderness Area and is an ideal site for a developed picnic area.

Page 28, Table 9

14 We are not familiar with a Sunny Flats Campground in the Safford Ranger District. Also, are all of the reconstructions water systems? The first line on the table implies that is so.

Page 32, Table 13

15 There is no commitment of funds for road maintenance. Also, number 12 should be deleted, pending the DEIS for the Steward Observatory proposal.

Page 33, Rose Canyon Lake Loop Trail

16 We believe any construction on the dam is going to promote or aggravate a bad situation. Fishermen inundate the area and travel is nearly impossible, now. It is just a matter of time before someone falls from the dam. A loop trail is needed, but not across the dam.

Page 35, Table 16. Habitat Improvement Projects

17 There are no projects for sport fisheries enhancement. A specific example is the placement of fish habitat structures in Pena Blanca Lake. All of the fish and wildlife project targets are very low. For instance, 300 acres of meadow maintenance or aspen regeneration is only 30 acres per year in the first period, declining to 10 acres per year by period 3. Current conditions will not be maintained with an effort that is so low.

18 Also, brush piles are not necessarily a desirable habitat enhancement based on current data for turkeys.

Page 42, DU 10, 1.

19 The prescription refers the reader to Appendix J for, one assumes, guidelines to "Maintain occupied habitat of commonly hunted species, listed threatened and endangered species, and management indicator species..." Appendix J omits all fish species, desert mule deer, javelina, black bear, scaled and Gambel's quail. The heading for Appendix J says "Minimum Habitat for Indicator Species". Federal threatened and endangered species may not be managed for "minimum" habitat.

This management practice should not opt for mere maintenance of habitat, but should allow for habitat improvement/enhancement for MIS/threatened and endangered species after research more accurately prescribes habitat requirements.

Page 43, DU 10, 5.

20 Extricated should be extirpated.

Page 43, DU 10, 7.

21 Mitigation is not acceptable for Federal threatened and endangered species. Guidelines under Section 7 of the endangered Species Act of 1973, as amended, must be followed.

Page 44, Activities

22 No definition for K01 in Appendix B.

Page 45, DU 34 and 46, 11.

23 We believe all riparian areas should be in satisfactory or better condition at an earlier date than 50 years. We recommend that this condition should be achieved within 30 years (by the end of period 3).

Page 48, Standards and Guidelines 4b.

24 Where is the Holy Cross Area?

Page 48, Standards and Guidelines 4d.

25 What lands in the Santa Rita Mountains are being considered as base-for-exchange lands? Are these lands the Sycamore Canyon addition to the Rosemont land exchange package, or additional acres?

Page 49, DU 43

26 We recommend the addition of another standard and guideline (#5). "All interior and boundary fences will have horse gates located in major drainages and major ridgelines."

Page 49, DU 50, Number 3

27 We recommend adding "...and trails" after the word roads.

Page 52, DU 10

28 We recommend that all wildlife and fisheries standards and guidelines be printed under the Management prescription, not referred to an Appendix.

Page 53, DU 12-15, 4.

29 Endangered species have other needs besides nesting habitat. We recommend the deletion of the word "nesting".

Page 54, Management Emphasis and Intensity

30 We recommend the deletion of the reference to the Mt. Graham astrophysical facility.

Page 55, DU 10

31 Same comment as page 52, DU 10.

Page 55, DU 19, 21, 60

32 To silviculturally manage the tree resource under uneven or even age management should include the known turkey habitat along the Canada Del Oro in Management Area 4.

Page 55, DU 11-15, 1.

33 We recommend the addition of the Mt. Graham Spruce Squirrel to the list.

Page 56, DU 41, 1.

34 We recommend the deletion of this allocation (Mt. Graham).

Page 59, DU 10

35 Same comment as page 52, DU 10

Page 59, DU 12-15, 1.

36 We recommend the addition of javelina, specifically bedding cover as well as forage; also game fish. Fisheries habitat structures should be included in this management area.

Page 62, Management Areas 3A and 3B.

37 We believe that lake area should be designated in this management area.

Page 63, DU 10

38 Same comment as page 52, DU 10.

Page 63, Standards and Guidelines 12.

39 There is still confusion about hunter access to forest lands surrounding the Sabino Recreation Area.

Page 63, Standards and Guidelines 2b-2c.

40 We believe this should apply forest-wide and particularly, in the case of elimination, to Rose Canyon Lake.

Page 65, DU 10.

41 Same comment as page 52, DU 10.

Page 66, DU 12-15, 4.

42 Same comment as page 53, DU 12-15, 4.

Page 67, DU 19, 21, 60, 1.

43 We question the management to sustain an average 40 to 50 year cutting cycle in oak woodlands, where the cycle should be 80-100 years.

Page 67, DU 19, 21, 60, 3.

44 We believe that fuelwood sales can be used to accomplish wildlife habitat improvement, also.

Page 70, DU 10

45 Same comment as page 52, DU 10.

Page 70, DU 12-15, 1.

46 We recommend the addition of Gould's turkey and javelina to the list.

Page 71, DU 47, 1.

47 We recommend that "... and trail" be added after the word road.

Page 72, DU 10

48 Same comment as page 52, DU 10.

49

2. We believe the percentage of Mearn's quail and cavity nester habitat retained should be 80-100%.

We believe a 3rd standard and guideline is needed. "Maintain 100% of occupied habitat for ridge-nosed rattlesnake."

Page 73, DU 12-15, 1.

50 We recommend the addition of Gould's turkey and javelina to the list.

Page 73, DU 19, 21, 60, 1.

51 We recommend the cutting cycle average be changed to include the following: "... except in oak woodlands, where the cycle will be 80-100 years. A minimum of 40% of the trees will be "old growth" (240 + years) within the sale area."

Page 76, DU 10

52 Same comment as page 52, DU 10.

Page 78, DU 10

53 Same comment as page 52, DU 10.

Page 79, DU 33, 34

54 We believe a 3rd standard and guideline is needed. "Watershed treatment upstream of this management area is a high priority to protect area from siltation and other adverse watershed impacts." Sycamore Canyon in the Atascosa Mountains is in specific need of this type of protection.

Page 81, DU 10

55 Same comment as page 52, DU 10.

Page 85, DU 10

56 Same comment as page 52, DU 10.

Page 85, DU 11, 1.

57 We recommend the addition of javelina and Gould's turkey to the unit.

Page 93, Wildlife

58 3.B) The Arizona Game and Fish Department has no funds allocated for this activity. Population trend data is obtained via hunter wing barrel returns.

59 3.D) Region V of the Arizona Game and Fish Department does not conduct turkey surveys. Data is obtained from hunter kill information on questionnaires.

60 Additional big game species include mule deer, javelina, and black bear. Mule deer and javelina are the same as white-tailed deer methods. Hunter kill data is also used for all these species. Black bear is monitored by recording sign, hunter kill, depredation reports, and campground problems.

61 Further, we recommend adding game fisheries - population and condition (AGF using electroshocking and creel census).

62 Monitoring of plan aspects that affect wildlife should more specifically follow the legal mandates of CFR-36, 219.3. The plan does not present methods to monitor MIS or threatened and endangered species. We question the estimated cost of MIS and threatened and endangered monitoring, since there is no reliable method for cost estimation.

Page 94, 7. Cost

63 Whose cost? Expense to the Arizona Game and Fish Department is higher than $400 annually for white-tailed deer survey.

Page 113, Appendix B

64 The management practices should include a separate category for MIS and threatened and endangered species, which should be incorporated into the management prescriptions applicable to all areas of the Forest (pages 40-51). the activities in Appendix B should include MIS and threatened and endangered coordination to allow agencies to scope the research needs of these species so that more specific habitat components can be prescribed.

Pages 116-126, Appendix C. Wildlife and Plant Diversity Standards and Guidelines

65 We believe the standards should be written out completely for each prescription. By the time a reader gets to prescription 14, the standards reference back through a maze of previous prescription guidelines. As an example, prescription 14 says "same as prescription 3 except:" For management activities C01, C02, C12. Prescription 3 for those activities says "same as standards 1. a.-g. and standards 2. a.e. in prescription 7B". Prescription 7B for those activities says "same as prescription 1 & 4 for standards 1. a.-g. except:" At this point, most managers would have no clue as to what standards apply to prescription 14. It would be much better if the wildlife standards and guidelines were under each prescription heading, rather than at the back of the plan in an appendix.

Page 116, Objective, Standards 1. a-g, 1.

66 We recommend the addition of Mearn's quail to the list, also ridge-nosed rattlesnake.

Page 116, Standards, 1. a. (3) c. (1)

67 We suggest a rewrite to read: "Retain 20% of the tree canopy in mature or old growth age classes. The average age of the stand in drainage ways will be managed at 180 years old, minimum. The reference for this change is Wildlife Coefficients Technical Report, August 1984, K. Byford, et. al. U.S.D.A. Forest Service, page 5.

However, we believe the retention of the 20% canopy cover in mature and old growth age classes within fuelwood areas is too low and should be adjusted to prevent fuelwood harvest in areas of sensitive species. Many such areas are as yet not designated as critical habitats for these species. The maintenance of status quo as an objective is unacceptable since 1) the plan should target enhanced conditions for economic and threatened and endangered species and 2) the viability of populations with the stated prescriptions is unknown due to the uncertainty of habitat requirements for many species.

Page 118, 1. a. (3) c. (9)

68 We recommend the addition of a second sentence. "In turkey and Mearn's quail habitats, lop and scatter the slash."

Page 118, 1. a. (3) d. (2)

69 We recommend the addition of a second sentence. "Roads will be reseeded and contoured to return to an original, preroad, condition".

Page 118, 1. a. (3) e. (1) (d) 1.

70 The wildlife fence specification should also state that the bottom wire of the fence will be "twisted barbless wire".

Page 119, 1. a. (3) f. (2)

71 Same comment as page 118, 1. a. (3) c. (9).

Page 119, 1. a. (3) g. (1)

72 We recommend the addition of "(d) restrict to no harvest during Merriam's and Gould's turkey nesting and brooding periods in occupied turkey habitats".

Page 119, Maintain existing wildlife structures

73 We recommend "a." be changed to: "inspect all water developments, other than springs, annually and maintain as needed. Inspect and maintain springs at least once every 4 years".

Page 120, 1. h. Timber

74 We recommend the addition of "2(a) ponderosa pine type will have at least 14 overstory trees/acre which exceed 20 inches d.b.h. 2(b) mixed conifer type will have at least 16 overstory trees/acre which exceed 24 inches d.b.h."

75 We recommend that Mearn's quail be deleted from this list and added to list on previous page.

Page 121, 1. h. (11)

76 We recommend a change to: "in harvest stands slash will be lopped and scattered."

Page 121, l. h. (13) (a) Gambel's oak

77 There should be no cuts in Gambel's oak unless absolutely necessary. The standard should read: "Retain at minimum 60% of tree canopy cover (compared to total enclosure) as mature and old growth; less than or equal to 20% as poles; and less than or equal to 20% as seedlings/saplings".

78 Further, we recommend "(b) 100% of occupied black bear habitat will be maintained".

Page 122, Objective

79 Maintain horizontal and vertical plant diversity.

Page 123, Objective 3.

80 We recommend a change to: "Manage Fuelwood stands at a 80-100% level of occupied habitat (compared to untreated stands) for Mearn's quail and primary and secondary cavity nesters. Manage ridge-nosed rattlesnake occupied habitat at a 100% level".

Page 123, Maintain existing wildlife structures b.

81 Maintain riparian fencing once every 5 years and/or after major flooding.

Page 124, Structural wildlife habitat improvement

82 We suggest the addition of: "C. Consider and implement as appropriate structural improvement for native and game fish habitats."

Page 130, Appendix E.

83 Channel Work should include siltation dams as a structural solution.

Page 132, Appendix F. Level 2

84 Please clarify the language about what a Level 2 road is. Does "high clearance vehicle" mean vehicles with high ground clearances or security clearance?

Page 139.

85 Black bear should be added to Group 2 and Group 6. Javelina, mule deer, Gambel's quail and scaled quail should be added to Group 6. Gould's turkey should be added to Group 8. Mt. Graham Spruce Squirrel should be added to Group 7.

Page 140, Appendix I

86 It is recommended that the pupfish should not be used as a MIS, since it is an unconfirmed hybird or, at best, an introduced

exotic species from outside the Santa Cruz watershed.

Page 141, Appendix J.

87 See comments for page 42, DU 10, 1. Also, we recommend that black bear, javelina, mule deer, and Mt. Graham Spruce Squirrel be added to the list.

88 Further, the methods of arriving at minimum habitat for MIS are not stated. the habitat sizes presented do not allow for population increases in these species and merely reflect the habitat sizes of Table 29 of the DEIS (DEIS page 75). Again, there is no allowance for incorporating future research findings by prescribing increased populations for MIS, if research indicates that current populations are below minimum viable population levels.

Arizona Game and Fish Department
Review of Coronado National Forest
Draft Environmental Impact Statement
for Draft Forest Plan

Public Issues

Pages 4 thru 8

89 The rewrite of this segment based upon public comment from the 1982 draft EIS is very good. We particularly commend the identification of issues pertaining to off-road vehicles (issue #1), Timber and Forest Products (issue #6), Fire protection (issue #12) Special Area Designations (issue #11) and Public Access (issue # 13). We do recommend adding to issue #1--"Recreational lakes on National Forest lands are jeopardized by siltation and loss of recreational fishing and boating opportunities. Funds need to be allocated for maintenance of Rose Canyon, Pena Blanca, and Rucker Canyon Lakes."

90 We also note the identification of Mt. Graham for astrophysical research purposes. Although we understand that the land allocation decision has been postponed for Mt. Graham, awaiting publication of a separate EIS, we have attached separate comments for Mt. Graham to this review of the LMP.

RANGE

91 The Proposed Action (PA) is second only to maximum range (Alternative B) in acres which will be managed at grazing level D. The alteration of habitat types for grazing objectives is also highest at grazing level D, with more miles of fence, higher use of non-native vegetation, and removal of woody species.

The DEIS states on page 104 that the PA will provide 89% of the benchmark grazing capacity at Period 5, while Alternatives C, D and E provide 93%, 92%, and 93% of the benchmark, respectively.

Alternatives C and D will have use and capacity exceeding PA in Period 5, with significantly less expenditure on structures and non-structural improvements. The information provided in the DEIS disputes the need for level D grazing intensity on most of the Coronado Forest. Also, by the Forest's own admission, Alternative C provides higher returns for game wildlife species and Alternative D for nongame and special emphasis wildlife species. Under Alternatives C and D, the majority of grazing lands are at level C intensity. The DEIS does not support the PA decision for rangeland management intensity to be at level D for most acres.

We support the rangeland intensity assignments for either Alternative C or D.

Summary of Tables 54, 55 and 56 in the DEIS

	Total Improvements		D	C	Period 1 Grazing		Period 5 Grazing	
Alternative	Miles Fence	# Waters	Level Grazing	Level Grazing	Use	Cap	Use	Cap
PA	290	510	773.1	357.1	350	333	360	360
C	100	21	109.8	1139.0	353	335	376	376
D	42	28	33.8	1099.5	352	334	372	372

92 The DEIS does not include dollar costs to implement the improvements under PA, but it would seem that benefits from range (i.e. increased livestock capacity and use) are achieved at a much lower capital investment under Alternatives C and D.

The Department commends the Coronado National Forest for its commitment to balance grazing capacity with grazing use by the end of the second decade, regardless of the projected AUM's.

93 A problem we foresee with the PA range alternative is the number of acres allocated to level "B" grazing management. Much of the level "B" acreage is in Management Areas 9 (Wilderness), and 14 (Zoological/Botanical Areas). The result of such a decision is inadequate protection for riparian zones in those management areas, from livestock grazing. We believe the broadleaf riparian zones that map as 7A riparian should be managed at either level "A" or level "D" grazing intensity within Management Areas 9 and 14.

FUELWOOD

94 There is a need to structure the fuelwood planning process. We recommend that fuelwood planning should be based on a 10,000 acre compartment concept, as used on all other Arizona Forests. This approach allows for Integrated Stand Management methodology on the Coronado Fuelwood Sales.

95 Also, we believe old growth component is needed in the fuelwood prescriptions to assure mature, contiguous stands of oak woodland for thermal cover and cavity requirements of Management Indicator and Emphasis species.

96 We believe commercial fuelwood sales can and should be utilized to achieve other resource objectives; i.e. range, wildlife, and recreation.

97 Reclaiming fuelwood roads should be a part of the management prescriptions in the Plan. We suggest establishing road reclamation bonds and using K-V funds for that purpose.

98 The oak woodland vegetation type is an important ecosystem which deserves a conservative approach to fuelwood management. We reiterate our 1982 comments on this issue. The Coronado has continued to pursue the notion that all fuelwood areas, regardless of vegetation type or terrain, should have the same management prescription. The forest-wide rotation of the cut cycle on a 40-50 year harvest schedule is potentially too short for some vegetation communities. Please refer to our specific comments for changes and additions to the proposed plan standards and guidelines.

RNA / ZBA

99 We wish to commend the U.S. Forest Service for pursuing the RNA and ZBA programs. The Coronado Forest, in particular, has numerous areas worthy of the classification.

We support the recommendations of the Proposed Action, but we think deserving areas have been omitted. Specifically, the following areas should be included as Zoological/Botanical Areas (ZBA's), Pine-Ramanote Canyons, The Muleshoe Ranch Redfield allotment, and the High Peak proposal for Mt. Graham, as outlined in Alternative D.

100 The Department supports the Proposed Action compromise for the South Fork of Cave Creek Canyon, which retains hunting recreation privileges and keeps the road and recreation site open.

LAW ENFORCEMENT

101 The DEIS describes various law enforcement activities under the current condition. The reality is that the Coronado is underfunded for law enforcement efforts and the Proposed Action will not rectify this situation. We are of the opinion that resources on the Coronado are suffering due to lax law enforcement effort. Areas of specific concern include:

102 - Mineral validity contests, where mining claims are suspected of being invalid; they are not pursued aggressively at this time. There are numerous invalid claims on the Coronado which are squatter camps on Federal lands. We believe these land squatters contribute significantly to the illegal take of wildlife.

103 - Off-road vehicle travel is a chronic problem on portions of the Coronado. Public information efforts will not replace aggressive law enforcement of violators. Please refer to our suggestions for cooperative enforcement under off-road vehicles heading.

PUBLIC ACCESS

Page 82 of the DEIS identifies a need to acquire "...over 1,000 miles of road rights-of-way in order to assure adequate access for public and administrative use."

104 Issue #13, Table 4, page 39 indicates that the PA will acquire 100 miles, or 10% of the necessary ROW. None of the alternatives offer more than 21% of the needed ROW acquisition. The issue of public ROW is a major problem on the Coronado, and needs to be resolved. Other solutions to ROW include cooperative efforts with other Federal and State agencies, and cooperative agreements with private landowners. We believe the DEIS should include an expanded discussion of public access and strategies, under the PA, to resolve the issue. We believe the discussion on page 115, which states a continued cooperation with public road agencies, is not an adequate commitment to this issue.

WILDLIFE

105 Since the first publication of a Coronado Plan in 1982 and the development of a Management Indicator Species (MIS) list, methodologies for wildlife monitoring have changed significantly. Due to those changes, the assumptions and limits that influenced the selections for the MIS are no longer valid. Additional species should be added to the list, and those currently listed should be reevaluated.

106 We believe that a new section needs to be added to the wildlife monitoring portion of the plan which outlines specific timelines for developing MIS habitat models and implementation of the RO3 WILD computer program designed to monitor output changes.

107 A major failing of the Plan, we believe, is the absence of any methodology for tracking (monitoring) wildlife, and predicting wildlife response to various management decisions. Areas where this type of capability are most needed are: fuelwood and timber sale planning, fire prescription planning, recreation development, and minerals entry.

108 Further, we wish to caution that the Arizona Big Game Strategic Plan and Arizona Wildlife Comprehensive Plan will be revised and updated in 1985-86. The intent in the revisions is to use new computer data storage/retrieval capabilities to track wildlife trends by Forest. The current plans are statewide in their detail, therefore, the new plans will be more specific to individual land units. Acknowledging that the Coronado LMP is a 50 year plan, with revisions, we recommend that language be added to the LMP that says that the most current Arizona and New Mexico Comprehensive and Strategic Plans will be used as guidelines for Coronado National Forest wildlife planning.

RIPARIAN

The Department commends the commitment of the Coronado National Forest to improve and protect riparian ecosystems. However, we have some concerns about the following specific issues.

109 - The maps included with the DEIS and draft Forest Plan are identical to those issued in the 1982 draft for the riparian areas. We provided extensive comments and specific corrections at that time, however, none of the corrections are depicted on the new edition of maps. Nearly 50% of the riparian communities on the Coronado Forest are not shown on the land plan maps. We suggest that either the maps should be corrected or a paragraph printed on the map that says not all riparian areas are depicted.

110 - We believe grazing level C or D needs to be applied with the understanding that any degradation of riparian in the 7A Management Area will result in enforcement of Level A (no grazing) grazing standards. Our specific concern is the vulnerability of riparian zones to livestock that are brought in from lowland areas. Cattle unaccustomed to rocky, steep terrain will concentrate in the riparian zone. Any grazing allotment with 7A riparian should be carefully planned to assure that seasonal grazing of livestock brought into the area is not the management practice in the riparian zone.

111 - We recommend that new recreational development in riparian 7A zones should be avoided unless the absence of wildlife and floral conflicts can be demonstrated.

112 - The Proposed Action will have all riparian areas in satisfactory or better condition by Period 5, identical to the No Action, Alternative A (DEIS pages 18 and 19). Riparian areas are of critical value and are jeopardized in the State of Arizona. We believe all riparian areas should be in satisfactory or better condition by the end of Period 3, which is thirty years from now. We would consider satisfactory condition to include active regeneration of broadleaf trees in the 7A Management Area communities.

113 - As stated in the Range segment, 7A Riparian in Management Areas 9 and 14 should be managed at level "A" or level "D" grazing intensity, with the same standards and guidelines as prescription 7A. Those prescription guidelines which conflict with wilderness regulations would not be implemented. A commitment from the USFS that riparian areas in grazed portions of Management Areas 9 and 14 will be mapped is assumed. (Proposed Plan, page 14, DU 46, 11.) We believe and recommend that any 7A riparian in Management Areas 9 and 14, which is being degraded due to grazing at grazing level "D", should be managed at grazing level "A".

114 - The Plan adequately addresses the impact of roads to riparian areas, but does not consider trails, particularly those established to move livestock or build fencelines. We believe any clearing of 7A riparian areas with the use of tracked vehicles or blades should be disallowed.

TIMBER

The Department supports the Proposed Alternative timber prescription, which manages for a 240 year rotation on suitable acres. 115 We do have specific concerns about an apparent conflict between timber management objectives. The Proposed Alternative speaks of sustaining and supporting lumber and fuelwood industries with timber harvest from the Coronado. It would seem that sustained yield of timber products could result in a conflict with the stated objective that all suitable areas for wood harvest will be managed to meet wildlife, recreation, and visual goals.

We recommend the following changes in timber management guidelines:

116 - Stand management and sustained yield silviculture should not be a forest-wide timber objective on all suitable acres. The design and prioritization of any and all timber sales should be governed by wildlife, recreation, and visual resource objectives.

117 - No timber should be harvested along designated forest roads, except for safety, and visual resource objectives.

118 - The harvest targets for timber sales should be removed. The Coronado Forest has zero targets assigned by the RPA or Southwest Regional Plan. We see no justification for creating timber targets on the Coronado Forest.

119 - Any reference to "rotating wildlife openings" should be qualified with the statement that openings will rotate in appropriate habitat types and where it is determined to be desirable for wildlife objectives.

We specifically oppose the notion that high elevation meadows in the spruce-fir and mixed conifer vegetation types should be "rotated". There has been a long term commitment to maintaining existing meadows on the Coronado. Conversely, rotating openings with regenerating aspen stands would be appropriate.

Areas of particular concern relative to timber are:

120 - The Chiricahua Mountains at the higher elevations above broadleaf riparian communities. Wildlife objectives in the Chiricahua's can be met with minimal timber harvest activities.

121 - The Santa Rita Mountains below Mt. Hopkins. There are no wildlife objectives for cutting timber in this locale. Timber harvest would probably be detrimental rather than beneficial to wildlife species and the lower elevation watershed.

OFF-ROAD VEHICLES

122 The Department supports the Proposed Action, which restricts off-road travel to designated roads and trails with certain exceptions.

However, we are greatly concerned about the need to have continuity in ORV management standards and guidelines and consistency in enforcement, statewide, among all land management agencies. Therefore, we believe that a joint meeting of all concerned agencies should be held to develop comparable and compatible ORV management.

FIRE

The Department supports the overall fire policy as described in the Proposed Action and DEIS. We commend the Coronado for instituting a liberal fire suppression policy within remote mountain ranges, including wilderness areas.

123 The Arizona Game and Fish Department has been an active cooperator with the Coronado National Forest in implementing prescription fires for wildlife habitat enhancement. The possibility for fire management within wilderness will aid in perpetuating wildlife populations, such as the Pusch Ridge bighorn sheep.

MINERALS

124 A current problem we perceive on the Coronado Forest is the large number of small mining claims that are either invalid, and are used as a guise by land squatters, or are in violation of Federal and State environmental laws.

Present funding is apparently inadequate for effective enforcement of mineral regulations on the Forest. To date, the violations far exceed any active filing of mineral validity contests. The potential environmental impacts to the Forest are severe. We, therefore, support a higher level of funding than the Proposed Action for enforcement of regulations and filing of mineral claim validity contests.

Specific Comments

Page 9, Reader's Guide

125 We suggest that page numbers for chapters be included. The chapter headings are very difficult to find.

Page 10, Table 1. 5. Wildlife and Fish

We recommend that "Game species habitat maintenance improvement" should be included under Uses and Activities.

Page 17, Maximize Present Net Value

126 We suggest a sentence be added which identifies the benchmark model "Max PNV assigned values" as Alternative C in the DEIS.

Page 18, Proposed Action Alternative

127 c. The wilderness decision for Mt. Graham must be deferred with the decision for or against an astrophysical site on top of the Pinaleno Mountains.

Page 23, Table 2. Management Options for proposed Mt. Graham Astrophysical Site

128 We believe the entire table, and all land allocation decisions listed in it, should be deleted and included with the Draft Environmental Impact Statement for the Steward Observatory Astrophysical Facility proposed in the Pinaleno Mountains.

Page 24, Table 3

129 The source of the acre outputs is not clear in this table. For instance, "manage for primitive recreation opportunities" shows an output for Alternative D only. Deductive reasoning leads one to believe that the 143.8 value equals the acres in the Whetstones, Dragoons, Tumacacori, and Chiricahua mountains that would be managed for primitive and semi-primitive nonmotorized recreation (page 21, Alternative D, subheading C.). However, that is only a guess.

130 The reader also has no idea what low, moderate or high levels of management intensity really mean. Is a mix of levels good management, or just an inexpensive way out to achieve the budget constraints imposed on the proposed action?

131 The table also illustrates contradictions within the alternatives that one suspects are anomalies of the computer program, not real outputs. As an example, Alternative C has zero acres managed for dispersed recreation or timber and fuelwood harvest to benefit wildlife values. Despite the zero output, the same alternative has the highest acres of game species habitat resulting from Fuelwood Management.

Page 26, Table 4

132 None of the acronyms are explained. PAOTS has not appeared in the text prior to this point. We believe either the definition should appear footnoted in the table (the best choice for readers) or a footnote should refer the reader to the appropriate page in the glossary.

Page 28, Table 4, Issue #2: Wilderness

133 We believe the decision for Mt. Graham should be postponed pending the DEIS from Steward Observatory.

Page 31, Table 4, Issue #5: Range Management

134 We suggest the inclusion of the page in the glossary where the management levels can be found. (It is page 185).

Page 32, Table 4, Issue #6: Timber and Forest Products

135 Alternative A, non-quantifiable comparison, has a typographic error. We recommend striking the last sentence "available on a sustained basis from suitable lands."

Page 41, Alternative C

136 The fact that this alternative "gives emphasis to recreation opportunities and wildlife habitat..." is an anomaly of the computer program, with no basis in fact. On page 20 of the DEIS, Alternative C is described as "...similar to the benchmark alternative called Maximize Present Net Value for Assigned Values, therefore, the emphasis is on economic efficiency..." The reason given by the Coronado as to why the high outputs for wildlife habitat improvement is the following:

> Alternative C has an economic value assigned to Recreational Visitor Days (RVD's). Because of the high number of RVD's assigned to Alternative C (Table 9, page 44), with an economic value attached to those RVD's, it became economically efficient to spend dollars on recreation and wildlife improvements. The reality is that the Forest Service does not acknowledge the economic value of RVD's, and does not fund for those improvements, therefore, we question whether Alternative C is a legitimate alternative when compared with the Proposed Action.

Page 41, Table 5

137 Please explain how more acres are available for livestock grazing under the PA than alternatives C and D, but C and D achieve higher livestock capacities and use with fewer acres at level D intensity?

Pages 46 and 47, Tables 10 and 11

138 Costs are lumped as operation and maintenance and capital investment, but benefits are divided by resource category. We believe a table is needed to compare the costs to the dollar benefits in recreation, wildlife, and range.

Page 49, Table 12

139 We believe alternative C is incorrectly labeled as D.

Page 52, Proposed Action

140 The Proposed Action presents the highest opportunity costs under PNV analysis. It seems that some of the assumptions are faulty in the analysis. We do not understand why wildlife habitat improvement results in a revenue benefit output under Alternative C, but the same activities for timber and fuelwood opportunities create a loss of revenue. It seems that there is a major error in the FORPLAN program, whereby hunting and fishing RVD's only track (increase or decrease) with activities flagged as wildlife habitat improvement or recreation site improvement. If the same activity is coded under Range or Forest Products, there are no hunting/fishing RVD outputs.

Page 52, Wildlife and Fish Habitat

141 The DEIS states "Wildlife habitat and populations would be most improved under Alternative C..." As stated above, we question the reality of Alternative C. It is our recommendation that Alternative C should be deleted as a "real alternative" or have it clearly explained in the DEIS that Alternative C is an economic efficiency baseline that maximizes PNV within the constraint of Wilderness requirements.

Page 56, Table 14

142 Please explain the term "Broadleaf Woodland". The majority of the Forest is mapped in this vegetation grouping. We are unfamiliar with this term, could the Forest mean encinal oak woodland?

Page 64, Paragraph 2

143 "Both laws (PL 96-550 and PL 98-406) prohibited further consideration of remaining roadless areas as potential wilderness..." does not mean that the boundaries of the congressionally designated Wilderness Study Areas (WSA's) can not be expanded.

Page 70, Wildlife and Fish

144 The javelina is uniquely representative of Southern Arizona deserts, and should be mentioned. The Tarahumara Frog has been extirpated from Arizona, and belongs under the threatened and endangered species discussion.

Page 74, Table 29. Management Indicator Species

145 We recommend javelina should be added to the list of "Species Needing Diversity" and black bear should be added to the list of species needing Riparian. We recommend both species should be listed under Game Species, along with mountain lion (page 75).

Page 76, Range

146 Please define the term "recreation livestock."

Page 78, Soil and Water

147 We do not recognize sedimentation as a "pollutant" of waterways. Toxic wastes, chemicals, and organic waste materials are "pollutants".

Page 82, Special Uses

148 The need for electronic sites includes High Peak in the Pinaleno Mountains. Is this correct or should it be Heliograph Peak?

149 Also, the paragraphs identifying Smithsonian Institution are no longer entirely correct. A new consortium of astronomy interests is evaluating the site selection of the NNTT mirror telescope.

Page 83, Table 35

150 The table does not relate to any explanation in the text. Where on the Forest is a disposal site located, and what type of waste? Where is the airport? What is a "run"? Is the one industrial site a fish hatchery, a prospecting site, or a motion picture location?

Page 84, Table 37

151 This table does not agree with Table 69 (page 116). Pine and Ramanote Canyons are listed in Table 37 and omitted in Table 69. Mt. Graham wet meadows are listed in Table 69 and omitted in Table 37.

Page 90, Recreation

152 Please explain why the number of acres of new site construction for developed recreation has as strong an influence on the Recreation Opportunity Spectrum (ROS) as Wilderness designation. Also, please explain the significance of changes in the ROS to Forest opportunities, i.e., how does this value relate to RVD's?

Page 92, Off-Road Vehicle Management

153 We suggest a change in the posting of areas for ORV to read as follows; "Under the Proposed Action, all forest areas will be closed except established roads and trails, which will be open unless signed as closed." (See detailed ORV comments for an explanation).

Page 93 - 97, Wilderness

154 We believe none of the maps included with the DEIS allow the reader to locate with any assurance the various Wilderness Study Areas (WSA's). It would be helpful to have a map for wilderness analysis included in the packet. The map should include the proposed boundaries under each alternative. A case in point is Whitmire Canyon WSA. The text on page 95 does not locate the WSA for the reader, that information is on page 65. The text also states that the Whitmire Canyon WSA boundary would be slightly modified under Alternative C, but the boundary maps for Alternatives C and D are identical. Where, exactly, are the boundary adjustments under Alternative C?

Page 96, Mt. Graham

155 We believe the decision process on Mt. Graham should be postponed pending the DEIS for the proposed astrophysical facility.

Page 100, Table 52

156 What methodology was used to create this table? In the absence of habitat models for the selected Management Indicator Species, we do not see how this table can be anything other than conjecture.

Page 102 Paragraphs 2-5

157 The discussion does not include the nongame emphasis under the Proposed Alternative.

Page 102, Paragraph 7

158 We believe Pena Blanca Lake should be included in the discussion as needing major renovation.

Page 102, Range

159 Please define "Satisfactory range condition." The USFS rates range condition as very poor, poor, fair, good, and excellent. At what point on the rating scale is range considered "satisfactory"?

160 Please explain the statement "While there is only a slight difference in grazing impacts by domestic and wild animals, the partitioning of forage to livestock can conflict with wildlife use."

Page 107, Fuelwood

161 It appears that a significant portion of the Forest is planned for mesquite fuelwood harvest, but this species is not mentioned.

Page 113, Mt. Graham Astrophysical Proposal

162 We believe the land allocation decision, and this portion of the DEIS, should be deferred until publication of the DEIS on the Mt. Graham astrophysical site.

Page 127, Table 77

163 Alternatives C and D have, respectively, 42.3 and 20.8 million, acre equivalents of wildlife habitat improvement in Period one. This is the first place where these figures appear in the DEIS. What are the improvements? What do they cost? Who pays for them? What is the return benefit to wildlife for these improvements, and are they "real" projects or computer projections?

Page 173, Glossary, Canopy

164 We believe it may be necessary to define a height class diversity for canopy cover. When "canopy" was used in the prescriptions and guidelines for wildlife (Appendix C), tree canopy was what the percentages were based upon.

Economic Analysis, Appendix B

There are two very basic concerns the Department has with the valuation of wildlife within the economic analysis in the DEIS:

1) The $16.90 value for a Wildlife-Fish User Day is unrealistically low (Table 4, Page 229).

2) Only the portion of time a hunter and/or fisherman spends actively hunting or fishing is given any value. The time spent driving, camping, resting, scouting, birdwatching, while on a hunting or fishing trip, is not assigned any value as a wildlife-related activity and apparently is not given any value in the recreation section of the Plan.

These combined effects greatly underestimate the value of wildlife-related activities, both in total and in relation to other uses. The ultimate effect of changing these values cannot be entirely forecast because of the complexity of the interactions in the FORPLAN model, but the effect would have to increase the value and importance of wildlife management and wildlife-related activities in the Coronado Plan.

165 Recognizing that the economic values are based on the 1985 Resource Planning Act (RPA) values (page 230), and may not be at the discretion of Coronado National Forest, does not reduce its impact on the economics which drive the Plan. The Coronado National Forest Plan DEIS states "wildlife recreation benefits were calculated as a weighted average of big game use, other game use and fishing use". All the values, except waterfowl hunting, for willingness to pay in the Draft EIS of the Resource Planning Act are well over the $16.90 figure used in the Coronado Plan (i.e. cold water fishing $22, warm water fishing $20, big game hunting $48, small game hunting $22, waterfowl hunting $15, upland game hunting $38) (Loomis and Sorg 1982). These values were reduced in the RPA DEIS, apparently to account for a difference between market price used for commodities and the willingness to pay used for wildlife. Although these values were reduced for questionable reasons and by questionable methods (see review of 1985 RPA Program prepared by CHEC for the Montana Department of Fish, Wildlife and Parks), it still produces a value of $19.00 per recreation day.

In contrast to these low values, the 1980 National Survey of Fishing, Hunting and Wildlife-Associated Recreation, Arizona (USDI, USDC 1980), gives an average expenditure per day as $38 per fisherman and $34 per hunter. It is remarkable that these gross expenditure estimates are higher than values fixed in the Coronado Forest Plan DEIS. Forest Service economists have stated "total value of a resource is equal to expenditures plus net value over and above expenditures" (Sorg and Loomis 1985). If this is true, and we believe it is, why is the value assessed in the Coronado Plan far below expenditure values? Values for Arizona given by Sorg and Loomis (1985) are also well above the $16.90 figure --$51.13 for general big game hunting, $47.05 for deer hunting. On page 235, it is stated dollar values used are "willingness to pay". How can willingness to pay be less than actual expenditures?

The same authors, John Loomis and Cindy Sorg, developed the RPA values and the values cited above. The RPA values have apparently been arbitrarily reduced by at least 37.5%. (See CHEC report for Montana Department of Fish, Wildlife and Parks). The CHEC report states that "the RPA values are being deliberately skewed against recreation resources". This seems to be a very valid criticism of both the RPA DEIS and the Coronado Plan DEIS values, which are based on RPA. 165

The assumptions used in calculating wildlife values are in error. On page 227, the Coronado EIS references the 1980-1985 Big Game Strategic Plans as saying "Big game population numbers would remain the same as would hunting numbers." In fact, the strategic plans for whitetail, javelina, muledeer and pronghorn predicted increases in demand ("hunting numbers") and called for increased populations.

In the Plan, the 1980-1985 USFS Comprehensive Plan and the 1980-1985 Strategic Plans are repeatedly referenced. Somewhere a statement is needed that these plans are currently being rewritten and that the Forest will comply with the new plans.

Agency response to Arizona Game and Fish Department

1. Objectives, standards, and guidelines for managing wildlife habitat have been moved from Appendix C of the Draft Plan to the appropriate management area prescriptions. This will make it easier to understand how the wildlife resource will be managed in relation to the other resources and uses. Some objectives, standards, and guidelines are specific to individual species. However, the majority are keyed to activities that affect wildlife habitat in general. Detailed management prescriptions for individual wildlife species are more appropriate at the project level and will be developed as needed through site specific environmental analysis.

   Your reference to 2621.3 Inventories seems to suggest that we should delay the implementation of the Plan while inventories are completed and the list of MIS is revised. Such an action would not be in the best interest of the wildlife resource since habitat improvements resulting from implementing the Plan would then be delayed; resulting potential population benefits would be delayed and selections of the MIS would only be moderately different. The Manual is a guide which provides objectives we will move toward. It is not intended to delay or stop positive actions.

   Your comments do not disagree with our objective of improved riparian and key habitats, nor offer alternatives. They only question the basis for our rationale (lack of the inventories) and the species affected. If you have information regarding specific habitats or species in jeopardy, you failed to mention them.

   Some attempt was made to define minimum viable populations for management indicator species in terms of defining currently occupied habitat. For many species, habitat and population data was limited or nonexistent. The assumption was the current occupied habitat was the minimum desirable situation for populations. This assumption of minimum habitat allows for needed habitat and population increases. The habitat acres are displayed in the DEIS, pages 74 and 75, and the Draft Forest Plan, page 141 (Appendix J). Wording has been added to the final documents to explain this.

2. The relationship of the "RPA Program" and "Regional Guide" to each other and the Forest Plan are given on page 1 of the Draft Plan (Relationship to Other Planning Levels and Studies). The terms are also defined in the Glossary of the DEIS, a companion document.

3. We have added the suggested footnotes.

4. The 408 figure is a typographical error and has been changed to 406. The supply column of Table 9, Draft Plan represents information from various benchmark alternatives and not one benchmark alone. The benchmark alternatives (See Chapter 2, DEIS) were developed to determine the maximum supply of single resource outputs while meeting at least minimum legal constraints for other resources. Each benchmark did produce multiple resource outputs (See Appendix B, DEIS). Therefore, we disagree that these figures do not represent maximum technically feasible supply for each of the resources.

5. All tables and narrative discussions related to allocation decisions for the proposed Mt. Graham Astrophysical Area have been deleted in the FEIS and Final Forest Plan.

   Management decisions for the Pinaleno Mountains have been made for all areas not directly affected by the proposed Mt. Graham Astrophysical Area. The only area directly affected is the 3500 acres originally proposed by Steward Observatory. Management direction for this entire 3500 acre area will be addressed in the Mt. Graham Astrophysical EIS. That EIS will contain a range of development as well as nondevelopment options, including wilderness for roadless areas within the 3500 acre area. Standards and guidelines developed from the analysis documented in the Mt. Graham Astrophysical EIS will be incorporated in the Forest Plan when the decision on land use for the 3500 acres is made.

Agency response to Arizona Game and Fish Department (continued)

The allocation decision for the Mt. Graham Wilderness Study Area is being made in the Forest Plan. The Forest Plan was revised to recommend wilderness for all 62,000 acres of the WSA. Our analysis and public comment now indicates there are no conflicts between this wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development.

6. We agree that fishing is an activity in wilderness areas of the Coronado N.F. The list was not intended to be all inclusive.

7. We disagree that the process used to select the management indicator species is no longer valid. Species selection is still necessary although the method of monitoring may change as new technology develops.

   In any event, this entire section of the Draft Plan has been deleted along with most of Chapter 3 (AMS). This deletion was made because of people confusing Chapter 3 with the proposed management direction in Chapter 4. Much of the AMS material is available in Chapter 3 of the EIS.

8. We agree. Goals for wildlife should provide for improving as well as maintaining viable habitat. This commitment is reflected in the wildlife and fish goals on page 23 of the Draft Plan.

9. The DEIS does discuss the impacts of timber and fuelwood harvest on other resources and local economies. It is true the sale of sawtimber will support local industries. The volume not utilized for sawtimber could support new fuelwood industries.

   The volume estimates in the proposed Plan and all alternatives are the result of applying the particular silvicultural methods of the particular alternative. In the case of the proposed Plan, the silvicultural methods are designed to enhance recreation, visual and wildlife goals.

   Therefore, we see no conflict with the various statements as you suggest.

   In any event, this entire section has been deleted along with most of Chapter 3 of the Draft Plan. This deletion was made because of people confusing Chapter 3 with the proposed management direction in Chapter 4. Much of the AMS material is available in Chapter 3 of the EIS.

10. The National Forest System is mandated by Congress to develop and administer the renewable surface resources for multiple use and sustained yield of the several products and services obtained therefrom.

    These terms are defined by the Multiple-Use Sustained-Yield Act of 1960 as follows:

    (a) "Multiple use" means the management of all the various renewable surface resources of the National Forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

    (b) "Sustained yield of the several products and services" means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the National Forests without impairment of the productivity of the land.

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Therefore, we find it entirely appropriate to have the term "sustained yield" in the Forest mission statement.

We do not believe the suggested wording for the last sentence is necessary. Recreational opportunities and wildlife habitats are two of the resources embodied in the term "multiple uses." We believe it is appropriate to separate the term cultural (social) values from the term rural economy.

11. We disagree. Development of the entire Forest Plan has had strong nongame input. Input has come from the Arizona Natural Heritage Program (now incorporated in the Nongame Branch of Arizona Fish and Game), local Audubon Society groups, Arizona and New Mexico Game and Fish Department, interested individuals and others.

    We see no rationale to add a "provision" to incorporate a specific plan when it is completed. Many agency plans were ongoing and not complete as we developed the Forest Plan. Planning itself is an ongoing process and the publication of a "plan" only represents the best decisions at that point in time.

    The need for additional information and research on management indicator species is prescribed in the monitoring section of the Forest Plan. We see no need for a goal statement to that effect.

12. The elements of this suggested goal are already embodied in the wildlife and fish goals. Consultation, cooperation, and protection of the wildlife resources are highlighted throughout the objectives, standards, and guidelines for all Management Areas of the Plan.

13. Site specific analysis for the proposed Redington and Italian Trap Recreation Sites has not been completed. These sites were listed to identify a future need for recreational facilities in the general area of the Santa Catalina Ranger District accessed by the Redington Road (FS Road #371). Site specific environmental analysis would be needed prior to selection of a final site or determination of facility extent.

14. There is no Sunny Flats Campground on the Safford Ranger District. It is on the Douglas Ranger District. All of the reconstruction needs do not involve water systems. Only the first five sites listed involve water systems. These errors you have noted were corrected in the Final Plan.

15. Table 13 of the Draft Plan deals with reconstruction needs and not regular maintenance needs. The proposed level of road maintenance funds is shown in Table 72, DEIS. Commitment to road maintenance is prescribed through objectives, standards, and guidelines throughout the Forest Plan.

16. We appreciate your support for a loop trail at Rose Canyon Lake. We will consult with the Department prior to a final location to address your concerns about access to the dam.

17. You are correct that no projects are projected for sports fisheries enhancement. Fish and wildlife direct improvement project proposals are low compared to other alternatives or to what may be most desirable. Table 16 reflects habitat improvements to be accomplished solely from wildlife funds. This is the direct result of having to live within budget constraints. We will be glad to consider and cooperate in additional projects that can be funded by your Department or others.

    Much habitat improvement comes from multiple activities such as riparian improvements, rangeland improvements, watershed improvements, prescribed burning for all reasons, and wood harvest. We do not agree that current conditions will not be maintained. Much past habitat improvement has come as a result of other activities.

18. We agree and have revised any references to brush piles for turkey habitat as your comments suggest elsewhere.

Agency response to Arizona Game and Fish Department (continued)

19. Appendix J, Draft Plan is intended to show the current occupied habitat for indicator species where data is available. Until better information is available on minimum habitat needs for individual species, we are making the assumption that minimum should not be less than what now exists. In other words, our management intent is to insure habitats are not reduced below current levels.

    We agree that improvement should also be provided for, especially with federally listed T&E species. We have revised the objective on page 42 to include the word "improve."

    There are six fish species listed in Appendix J. The black bear has been added as a management indicator species. The other species you refer to, desert mule deer, javelina, scaled and Gambel's quail were not felt to be necessary indicator species at this time.

20. The misspelling has been corrected.

21. We agree. The word mitigation has been replaced with "habitat needs." This is in keeping with the wildlife and fish goal on page 23 of the Draft Plan.

22. Activity K01 is soil resource inventory. We have added this to Appendix B.

23. The length of time necessary before 100 percent of the riparian area will be in satisfactory condition is due to the time needed for woody riparian vegetation to recover.

    A riparian area is considered satisfactory when at least 60 percent of the woody plants are in three or more species; three age classes are represented with at least 10 percent in sprouts and seedlings; and at least 60 percent of natural cover is maintained. Since riparian areas that are now unsatisfactory usually are lacking the young age classes of woody vegetation, it will take about 30 years to establish the two younger age classes once uses are controlled.

    The Forest Plan prescribes that at least 25 percent of the riparian area will be in satisfactory condition by the end of the Second Period and that the percentage in satisfactory condition will increase each year. The statement that 100 percent will be satisfactory by the end of Period 5 does not mean we will wait until than to make improvement.

24. The Holy Cross Area is in Section 5, T.10S., R.16E. G&SRM, about two miles southeast of Oracle.

25. The lands in the Santa Ritas proposed for "base-in-exchange" are those in the Sycamore Canyon addition to the Anamax (Rosemont) exchange proposal.

26. We agree with the intent of your recommendation. The following wording will be used in the Final Plan.

    4. "All interior and boundary fences will have horse or hiker gates located at appropriate places such as trails, major drainages and major ridgelines".

    This was added to DU 44 since it is probably more of an access need than land line location need.

27. We agree and have made the recommended changes.

28. We agree. The specific wildlife standards and guidelines, previously in Appendix C, have been moved to the Forest-wide prescription. This was done rather than repeat them for every management area. The standards and guidelines are keyed to resource activities and are applicable to more than one management area. The specific wildlife objectives in Appendix C are now found in the appropriate management area prescriptions. This change was made to eliminate repetitive material and make the prescriptions more understandable.

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29. We agree. The word "nesting" has been deleted. Also the word "improve" has been added.

30. See response number 5.

31. See response number 28.

32. This guideline for Management Area 2 applies to coniferous forest types. If the turkey habitat along the Canada Del Oro is within this vegetation type, the guideline will apply. Plan implementation direction provides for applying the prescription that fits the identified capability area type.

33. At this time there are no habitat improvement needs identified for the Mt. Graham Spruce Squirrel. Therefore, we have not included it in the list for which direct improvement projects will be planned. This species is included in the list of those needing maintenance or improvement of habitat through mitigation of other activities. This list was in Appendix C and has been moved to Management Area 2.

34. See response number 5.

35. See response number 28.

36. We do not plan any direct habitat improvement projects for javelina. This is the reason it is not listed. This species is included in the list of those needing maintenance or improvement of habitat through management of other resource activities. This list was in Appendix C and has been moved to Management Area 3. Bedding cover needs have been added to the wildlife standards and guidelines for range and fuelwood management activities.

Fish habitat improvement in Management Area 3 will concentrate on threatened and endangered species rather than game fish species. Fisheries habitat structures needed for T&E species are included. The game fisheries (lakes) are included in Management Area 3A.

37. The lake areas are included in Management Areas 3A and 3B. Reference the standard and guideline #7 under DU 5. No fishery habitat improvement projects, other than T&E species, is included because of funding constraints. We will be glad to consider and cooperate in projects that can be funded by your Department or others.

38. See response number 28.

39. Your 1985 Hunting Proclamation correctly states the rule for entry into Sabino Canyon and should be carried forward.

40. We think additional discussion is needed on this recommendation. Your suggestion seems to imply the Department wishes to change fish management emphasis for Rose Canyon and other lakes from game fishes to nongame fishes. As we monitor and evaluate the Forest Plan direction, we will work with you to determine future management needs for fishery resources of the Coronado N.F.

41. See response number 28.

42. See response number 29.

43. We agree that the oak woodland vegetation type is an important ecosystem and believe that our planned approach to fuelwood management gives proper emphasis to maintaining this ecosystem. Fuelwood harvest is only one management tool to be used in conjunction with others such as prescribed burning.

The cutting cycle of 40 to 50 years proposed in the Forest Plan is based on past experience with regrowth of oak species. A cutting cycle is the average time between entries into a particular stand of trees for some sort of harvest treatment. It does not represent the rotation age of the

Agency response to
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species being featured. We would agree that the rotation age for woodland species is 80 to 100 years or even longer. Since research is lacking for the oak woodland of Arizona, we have not identified a rotation age. A correlary to fuelwood management is the 20 year cutting cycle often used for ponderosa pine with a rotation age of 120 years.

We do not believe a longer harvest schedule is necessary for drainageways because an old growth component is recognized in management of the fuelwood stands.

44. We agree. That is why wildlife habitat was included in guideline number 2 as one of two primary objectives. Other or secondary objectives are included in guideline number 3.

45. See response number 28.

46. We have added Gould's turkey to the list because we do have habitat improvement projects planned. No direct projects are planned for javelina. This species is included in the list of those needing maintenance or improvement of habitat through management of other resource activities. This list was in Appendix C and has been moved to Management Area 7.

47. See response number 27.

48. See response number 28.

49. We have revised the objective to prescribe an 80 percent or greater level of occupied habitat retention for high density quail habitat (as defined by Arizona Game and Fish). In low density habitat we feel 60 to 80 percent retention is sufficient based on past experience.

We agree the cavity nester habitat should be 80 percent or more retention and have made this change.

We agree to a 100 percent habitat retention for the ridge-nosed rattlesnake. This is already covered in objective #1 found in Appendix C which was moved to the prescription.

All of these changes were also made to the Management Area 4 prescription.

50. See response number 46.

51. We disagree with the cutting cycle change as noted previously. The wildlife and vegetative diversity standards and guidelines were revised to prescribe 20 percent or more retention of an old growth component in fuelwood stands. The 20 percent is intended as the minimum level which we feel is adequate based on past experience.

52. See response number 28.

53. See response number 28.

54. After the big flood of 1983, we examined the watershed of Sycamore Canyon to see if our management had contributed to the exceptional runoff. We found the watershed to be in a good hydrological condition, and were unable to prescribe any needed changes. When the area was proposed as critical habitat for the Sonoran Chub, we again looked and felt that the only threat was from mining. Our conclusion from this is that standard watershed management prescriptions are adequate for these upstream areas, and no special direction in the Plan is needed.

55. See response number 28.

56. See response number 28.

57. See response number 46. The list which was in Appendix C has been moved to Management Area 14.

58. We acknowledge and have revised the monitoring method.

Agency response to Arizona Game and Fish Department (continued)

59. We acknowledge and have revised the monitoring method.

60. We have added the black bear as a management indicator species. The suggested monitoring method has also been included.

We see no need at this time to include mule deer or javelina as management indicator species although they are big game species.

61. We question the need to include game fishes as management indicator species.

62. We disagree. Methods to gather data and information on species are shown. Evaluation of this data is another step and will be done by appropriate methods, such as habitat models. Monitoring costs shown are direct costs to the Coronado National Forest and are based on past experience in similar type activities.

63. All costs shown are direct costs to the Coronado National Forest. Costs to other agencies are not included. Costs are explained in item 8 Evaluation. Additional wording has been added to reinforce this explanation.

64. The management of indicator species and threatened and endangered species are included in all management practices related to wildlife (DU 10 through DU 15). Coordination activities are covered in activity C 12. Therefore, we see no need to add separate management practice or activity codes. The direction to develop more specific habitat components is covered in the monitoring section of the Plan.

65. See response number 28.

66. We have added the ridge-nosed rattlesnake to this list of species for objective #1.

Objective #3 covers habitat requirements for Mearn's quail.

67. We have reviewed the definition and guidelines for old growth used by the Northern Arizona Forests. They define old growth as "A stand of timber (or woodland species) that is past full maturity and well into old age. The last stage in forest succession". We have included this definition in our wildlife and plant diversity standards and guidelines. We question if the minimum standards used by Northern Forests for ages, number of trees, and tree sizes is appropriate for Southern Arizona woodlands. For example, a minimum diameter of nine inches may be okay for pinyon-juniper on the Coconino, but may be too small for the oak woodland on the Coronado. We welcome your help and that of others to determine appropriate standards for the old growth component on the Coronado.

We have revised the guideline to say "Retain 20 percent or more of the stand in mature or overmature age classes as an old growth component. The 20 percent is intended as a minimum and can be increased to meet needs of specific wildlife species as you suggest.

68. We agree and will add your suggestion.

69. We agree with the term reseed. We cannot agree to the part about "contoured to return to an original preroad condition." This may be desirable in some instances but not in all. Fuelwood roads are often designed to serve other purposes as well as wood harvest.

70. We regularly prescribe barbless wire in antelope ranges and where appropriate for other species, but can not agree that such a forest-wide specification is appropriate.

71. See response number 68.

72. We have added your suggested guideline. We are already prescribing this guideline on the Douglas Ranger District where most beargrass is being harvested.

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73. Most water development on the Coronado are maintained by grazing permittees. They are responsible for inspection and maintenance under the terms of their permits. This is monitored as part of our regular range inspections. A few wildlife waters are maintained by Arizona Game and Fish, who are also limited in their ability to do the job by budget constraints.

We can not inspect all water developments every year because of budget constraints. All, including springs, would be inspected and maintained within the stated four year guideline. Cooperation from Game and Fish Department personnel to bring maintenance needs to our attention will be appreciated.

74. We assume your recommendation is to help define the old growth component for ponderosa pine and mixed conifer stands. We do not believe these guidelines are necessary due to the age class and basal area silvicultural guidelines already included for Management Area 2. These silvicultural guidelines were designed primarily for wildlife habitat enhancement. Monitoring and evaluation of timber harvest areas will determine if other guidelines are necessary.

75. We have deleted Mearn's quail from the list for Management Area 2 since it does not reside in this area.

It is listed for Management Areas 1 and 4.

76. We agree. The recommended wording has been included except it is still tied to the water need.

77. We do not agree there should be no cuts in Gambel's oak unless absolutely necessary. One way to insure a mixture of age classes is to cut stands. We feel the age class guidelines are adequate as now shown based on past experience.

78. The objective of maintaining 100 percent of black bear habitat is now covered by listing the bear as a featured species. Therefore, there is no need to include this same objective in the mitigation guideline.

79. This correction has been made in the Final Plan.

80. See response number 49.

81. We have not added your recommendation because we can not anticipate and budget finances for emergency situations. The list of possible replacements after natural disasters goes far beyond fences for riparian areas.

82. We have added your suggested guideline for Management Area 9.

83. The term structures is intended to cover all appropriate structures such as siltation dams.

84. The term "high clearance vehicle" does refer to vehicles with high ground clearance. It has nothing to do with security clearance.

85. We agree that black bear should be added to Groups 2 and 6.

We agree that Gould's turkey should be added to Group 8.

We have added Mt. Graham Spruce Squirrel to Group 8 but not 7. It was agreed initially that Group 7 would consist of bird species that draw large number of people.

We have not added javelina, mule deer, Gambel's quail or scaled quail to any group. Other species were selected as better indicator species. We will consider adding later if a need can be shown.

86. We agree and have deleted the Desert pupfish for the reasons you stated.

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87. See response number 19. Also we have added the Mt. Graham Spruce Squirrel to the list.

88. Although the Forest Plan suggests methods to monitor responses of wildlife populations and habitat, the primary purpose is to identify species and activities to be monitored and the points at which management direction needs to be evaluated and changed if necessary. Monitoring methods listed are those currently available to us. As new methodology is developed, including habitat capability models, we plan to adopt any that meet the needs and are efficient.

Early in the Coronado N.F. planning process all interested wildlife managers were invited to participate in the selection of indicator species. Participants in this process included representatives of Arizona Game and Fish, U.S. Fish and Wildlife Service, the University of Arizona, Tucson Audubon Society, the Nature Conservancy, and Forest Service Wildlife Biologists. They agreed on a list that seemed appropriate at the time. The list of management indicator species will be reviewed and updated concurrent with the wildlife monitoring and evaluation.

Some attempt was made to define minimum viable populations in terms of defining currently occupied habitat. For many species, habitat and population data was limited or nonexistent. The assumption was the current occupied habitat was the minimum desirable situation. Since Appendix J defines these as a minimum level, we disagree there is no allowance for needed habitat and population increases.

89. The specific concern you raise about lakes within the Coronado N.F. is already embodied in the issue on page 5, DEIS under Wildlife and Fish. It may have been more appropriate under Recreation but see no need to change it now. The whole issue has been addressed in the planning process.

We agree funds are needed to resolve the siltation problems. The Forest Plan addresses the need to maintain existing lakes for fishing opportunities. See page 62, Draft Forest Plan. All major lakes on the Coronado National Forest, except Rucker, were built by the Arizona Game and Fish Department. Each lake built by the Department is under special use permit which requires maintenance of the dam and other facilities. Recognizing that all agencies face budget constraints, the Forest will continue to cooperate in every way possible with both the facility and habitat maintenance for all lakes.

90. Management decision for the Pinaleno Mountains have been made for all areas not directly affected by the proposed Mt. Graham Astrophysical Area. The only area directly affected is the 3500 acres originally proposed by Steward Observatory. Management direction for this entire 3500 acre area will be addressed in the Mt. Graham Astrophysical EIS. That EIS will contain a range of development as well as nondevelopment options, including wilderness for roadless areas within the 3500 acre area. Standards and guidelines developed from the analysis documented in the Mt. Graham Astrophysical EIS will be incorporated in the Forest Plan when the decision on land use for the 3500 acres is made.

The allocation decision of the Mt. Graham Wilderness Study Area is being made in the Forest Plan. The Forest Plan was revised to recommend wilderness for all 62,000 acres of the WSA. Our analysis and public comment now indicates there are no conflicts between this wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Roadless portions of the Pinaleno Mountains outside the WSA were not considered for a wilderness option.

91. & 92. The general conclusion of the Arizona Game and Fish comments is as follows: "The DEIS does not support the PA (Proposed Action) decision for rangeland management intensity to be at level D for most acres. We (The Arizona Game and Fish Department) support the rangeland intensity assignment for either Alternative C or D."

Agency response to Arizona Game and Fish Department (continued)

The main point of the comments seems to be that range management Level C is more cost effective than Level D. A summary table was provided in your comments to support this point. Based on the information presented in the table, we do not disagree with the general conclusion. In fact, we agree with the point that the most cost effective levels of range management should be practiced. This is the reason that the Proposed Action predicts Level D management for only 50 percent of the suitable rangelands versus 73 percent in Alternative A (continue current management direction). We believe that lower levels of range management and livestock use are more efficient on some rangelands.

The forest planning model (FORPLAN) used by the Coronado National Forest achieves cost efficiency based on total costs and resource benefits assigned to each management prescription and not for an individual component such as range or watershed management. In other words, it considers the total resource management job rather than individual parts. The predictions of total costs, resource outputs and benefits are made based on the summation of prescription allocation to each analysis area. Therefore, we believe it is as important to compare several related resource management components as well as a single resource component between alternatives. An example based on predicted costs is shown below.

Alternatives - Period 1
(Thousand dollars per year)

	PA	A	B	C	D	E
Watershed management	225	239	2583	389	362	359
Wildlife management	215	225	328	271	275	265
Range management	604	644	688	531	522	588

In summation, the additional costs incurred for better range management can offset the lack of direct funding to manage other resources even though range may not get a direct benefit in terms of livestock use or capacity increases.

During plan implementation, monitoring and evaluation, we will focus on site specific management effectiveness for each resource component. For example, if Level C range management is more effective for a specific allotment than is Level D given all resource considerations, this is what will be prescribed as indicated in the standards and guidelines for each Management Area.

In review of your comments, we did find some errors in Tables 54 (Range Management Levels) and 56 (Range Improvements) of the DEIS. The corrections are included in new tables 54 and 56 of the Final EIS. Some of this same information was used in Tables 4 and 5, DEIS and was corrected in new Tables 3 and 4 FEIS. These errors were due to incorrect human interpretation of management prescription allocation and was not the result of basic errors in the planning model (FORPLAN). This new information does not affect the relative data in your summary table as shown below:

Summary of New Tables 54, 55, and 56 in the FEIS (Total Improvements)

					Period 1 Grazing		Period 5 Grazing	
Alternative	Miles Fence	# Waters	Level D Grazing	Level C Grazing	Use	Cap	Use	Cap
PA	225	405	761.8	306.7	350	333	360	360
C	80	26	109.8	1158.3	353	335	376	376
D	42	26	33.8	1106.0	352	334	372	372

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93. We have added additional direction in Management Area 9 to prescribe that riparian areas will be grazed under intensive management or not at all. All management areas have been mapped to show the various capability area types, including riparian types. These are available to the resource managers and are an integral part of deciding on the correct standards and guidelines to be applied. See implementation direction on pages 38 and 39, Draft Plan.

94. We agree that the planning of fuelwood sales should be done on a "compartment" concept. The terrain found on the Coronado does not allow for large continuous areas of suitable fuelwood stands. Therefore, a 10,000 acre standard may not be applicable to our situation. The size of each compartment should be relative to all resource needs, including wildlife. For instance, a major drainage might be a suitable compartment for planning.

95. An old growth component is included in the fuelwood prescriptions by revision of the wildlife and plant diversity standards and guidelines. See response number 67.

96. We certainly agree with you. The objectives for fuelwood sales are stated many times throughout the DEIS and Plan.

97. We agree. The direction for this is found on page 118 of the Draft Forest Plan. Additional direction is found under DU 1 and DU 48 of appropriate management areas. The use of bonds or KV funds to accomplish this is often done, however, these are administrative procedures and do not belong in a resource plan.

98. See response number 43.

99. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the plan, and others were considered as suggested by various respondents.

Agency response to Arizona Game and Fish Department (continued)

The question of a zoological/botanical area for the spruce-fir forest on Mt. Graham will be addressed in the EIS being prepared for the astrophysical proposal.

Pine-Ramanote Canyon (Atascosa Mtns.) - We agree these areas need further evaluation and plan to do so with interested parties in the next planning period. Our initial evaluation is that these areas are not highly unique, are highly inaccessible and are not currently threatened by current or anticipated future use. In cases such as this, special designation which calls attention to the area might be more of a threat to unique values because of increased public use. This phenomena has happened in several other special areas and increased activity threatens to destroy the values they were established to protect.

Redfield Canyon (Galiuro Mountains)

Most objectives of classifying the Redfield Canyon watershed as a Zoological/Botanical Area can be accomplished through application of management prescriptions for the Galiuro Wilderness. The only concern which is not addressed by wilderness classification is the need to close the area to grazing. We agree that a combination of economic and ecological factors makes it impractical to graze the Redfield Allotment, and this is reflected in the final Coronado Forest Plan.

100. Thank you for your support of the management direction for the South Fork of Cave Creek Canyon. The total management direction is prescribed in Management Area 14 of the Forest Plan.

101. We would agree that the Coronado N.F. is underfunded for law enforcement efforts as well as for many other efforts. However, we cannot agree that resources are suffering due to lax law enforcement efforts any more so than anywhere else.

102. We take exception with your statement that we do not actively pursue the validity of mining claims. Please see response number 124 for a perspective of the total problem.

103. The proposed Plan addresses the problems of off-road vehicle travel. Please see response number 122 for more details. We agree public information efforts will not replace law enforcement efforts, but it is a necessary part of the entire effort. We would be more than happy to enter into a cooperative law enforcement effort in this respect. In fact, we have made past attempts at this type of cooperation.

104. We agree that access to public lands of the Coronado National Forest is a critical problem and the Proposed Action calls for an increase in right-of-way acquisition. In order to achieve the goal of reasonable access to all parts of the Forest, we must count on the cooperation of other Federal, State, and County agencies as well as private landowners who have an interest in road management and access. We feel acquisition of rights-of-way across private lands within the Forest boundary is primarily our responsibility. Access to the Forest boundary is the responsibility of Federal, State, and County agencies. We are willing--even anxious--to work with other agencies to acquire needed public access. The unique "Islands in the Desert" nature of the Coronado National Forest sets it apart from other forests in the National Forest System. The scattered ownership pattern due to the isolated mountain ranges in this area results in a real challenge to satisfy the need for public access. As noted above, we must count on the cooperation of all to meet that challenge. We recently asked for your active cooperation in a letter specifically about access to the Whetstone Mountains. With such cooperation we will have "an adequate commitment to this issue."

105. See response number 88.

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106. We disagree. The monitoring plan already suggests that modifications to monitoring techniques may be necessary. See item 8 Evaluation in the wildlife monitoring section. To suggest timetables for specific models or computer programs is unnecessary given todays rapidly changing technology.

107. Again we disagree. The monitoring plan provides for monitoring certain indicator species and their habitats to determine the effects of various management activities. While the selected indicator species may prove not to be the most desirable, the commitment is there to revise the list and techniques for monitoring purposes. Also some of the specific activities, such as timber and fuelwood harvest, are scheduled for monitoring of the applied management prescriptions.

108. Direction for consultation and cooperation with many wildlife managing agencies is prescribed in the Forest-wide prescription. It is common sense to utilize the most up-to-date information for planning, such as that contained in Game and Fish Strategic Plans. Therefore, we see no need for directional language to use specific sources of information.

The Forest Plans are not 50-year plans. They are normally in effect for 10 to 15 years after which time they must be revised, if necessary. Effects of alternatives are estimated for 50 years as a way to evaluate long term consequences.

109. Maps for the Final Forest Plan have been updated to include additional riparian areas that have been identified and field checked since the initial Draft Plan. Any additional riparian areas that have not been identified, verified, and mapped at this time will be added later. Implementation direction on page 39 of the Draft Plan provides for applying the proper management direction in instances where mapping is inadequate. We do not believe a notation on the maps is necessary.

110. This understanding is included within the direction for range management practices for Management Area 7.

111. We agree in principle. However, specific recreational development proposals should be analyzed on their own merits keeping in mind the primary objective is to perpetuate the riparian dependent resources.

112. See response number 23.

113. See response number 93.

114. The guidelines prescribed for range improvements in riparian areas (Management Area 7) will cover your concerns about livestock trails and fence clearings.

115. See response number 9.

116. Timber harvest on the Coronado N.F. is done primarily to benefit wildlife, recreation, and visual resources. See timber harvest objective (DU 19 and 21) on page 55 of the Draft Forest Plan. Sustained yield should be an objective within constraints imposed to meet the stated management emphasis. Sustained yield of any resource does not necessarily mean harvesting the maximum potential.

117. We believe the stated timber harvest objectives and guidelines are also appropriate for scenic areas, such as along forest roads.

118. The timber yields shown in the Draft Plan and DEIS are not intended as "targets" but as estimated yields resulting from the proposed management direction. Targets have not been assigned to the Coronado in the past because the suitable timber lands have been considered "unregulated." We recognize these yield estimates have a way of becoming targets. This is one reason the timber sale plan (Table 18 Draft Plan) only shows a harvest that is based on current sawmill capacity.

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119. Existing meadows are not part of the suitable timber land base. They will be maintained as meadows. The timber harvest practices will create additional openings on a rotating basis.

We have added additional wording to timber harvest guidelines for Management Area 2 to satisfy your concern about wildlife openings.

120. The timber harvest prescriptions for Management Area 2 are designed specifically to emphasize wildlife resources along with recreational and visual values.

121. Although part of the Santa Rita Mountains are within Management Area 2, it is not part of the suitable timber land base and will not be logged. Other wildlife improvement activities may be appropriate.

122. We agree with you that close cooperation and coordination is needed in the management of ORVs. You held meetings at several locations in the State to discuss ORVs on federal land. We were represented at the one held in Tucson. All Arizona National Forests are addressing the ORV issue in their Forest Plans. The following is a summary of the Coronado Forest proposed policy.

The purpose of the Coronado planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. Approximately 70 percent of the Forest now provides the opportunity for some form of motorized recreation activity. (See Table 21, page 62, DEIS). Before any specific roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements.

Signing or designation of roads or trails open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads or trails are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is much work yet to be done to sign all roads and trails. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off the road use of vehicles is not acceptable. Direct enforcement of the policy will have to be implemented in stages along with the signing.

123. Recent changes have been made in the Forest Service fire management policy for wilderness areas. Prescribed fires may now be used to enhance wilderness values including habitats for federally listed T&E species; to reduce fire hazards; and to permit lightning to more nearly play its natural ecological role. This direction is given on page 83 of the Draft Forest Plan.

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124. We recognize there is a significant problem of illegal occupancy of mineral claims on National Forest land under the guise of the mining laws. Although we do not know immediately when every claimant begins occupancy of a claim, there are very few cases of long-term occupancy that escape detection. Even if a Forest Officer does not observe an occupancy situation, a forest user is almost sure to bring it to our attention. I do not feel any additional efforts or resources are necessary to identify occupancy problems.

There is, of course, a limit to the number of cases we can investigate andprocess in any given period of time. Those cases that receive highest priority are those in wilderness or other sensitive areas and those with potential for serious resource damage. It must be recognized, however, that the 1872 Mining Law and FLPMA grant mineral claimants broad powers to explore for and develop minerals on public lands. Our 36 CFR 228 regulations provide authority to enforce reasonable constraints to protect surface resources while not unduly restricting activities authorized by the 1872 Act.

A comprehensive survey of mining claim occupancy would be far beyond the capability of the Forest Service or, I feel sure, The Bureau of Land Management (BLM). An illustration may help portray the magnitude of such a survey. There are over 5,000 mining claims on the Nogales Ranger District, which is one of five Ranger Districts of the Coronado National Forest. To complicate matters further, the situation is far from static. New claims are filed every day. Also a claimant may occupy his/her claim for a few days or weeks, then be gone for a period of time. Even if we could compile a list of occupied claims as of a certain date, a month later it would no longer have much value.

A number of mining claims were recently examined on the Coronado National Forest in an area which was occupied by a number of claimants who have shown no serious effort to mine or explore for minerals. It was in an area of the Forest that seemed to represent the most serious and flagrant problems of occupancy under the guise of the mining laws.

Additional claims will be examined as the situation warrants and mineral examiner time constraints allow.

If a suspected illegal occupancy of a mining claim is reported, the claimant will be asked to submit an operating plan. If we determine that occupancy is reasonably necessary to the operation, that plan and the occupancy will be approved. If occupancy is not necessary, the claimant will be required to live elsewhere while working the claim. If no serious attempt is being made to mine or explore for minerals, the Forest will request the assistance of a mineral examiner. The mineral examiner will visit the claim, examine any mineralization or evidence of mining activity, and determine if, in his opinion, a reasonable effort is being made to explore for or mine minerals in evidence on the claims. If it is concluded that mineral is not present to warrant continued development or that no mining-related activity has taken place on the claims, action to resolve the occupancy problem will begin. This can amount to attempting to secure relinquishment of the claim)s) or a validity examination by a Forest Service mineral examiner and a recommendation to BLM that the case go to contest. In lieu of that, the Forest Service can pursue administrative civil action in an attempt to effect removal of the occupant and his property.

125. Page numbers for chapters and subsections are included in the Table of Contents. The purpose of the Reader's Guide is to describe what can be found in each chapter. The purpose of Table 1 is to identify where specific items of interest can be found in each chapter and subsection.

126. The benchmark alternative known as Maximize Present Net Value with Assigned Values is not exactly the same as Alternative C. The benchmark was modified slightly to become Alternative C and they are very similar. This relationship is noted on page 20 of the DEIS.

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127. See response number 90.

128. See response number 5.

129. The narrative lead-in to Table 3, DEIS clearly states the purpose of the table display. The values are not resource outputs, but acres of management prescription allocation for each alternative. Multiple resource outputs occur from each management prescription.

You are correct in your deduction that the 143.8 acre value equals the areas in the Whetstones, Dragoons, Tumacacori, and Chiricahua Mountains that would be managed primarily for primitive recreation opportunities as indicated on the Management Area Map for Alternative D.

130. The management intensity levels are defined in Appendix C to which you were referred by the narrative lead-in to Table 3, DEIS. A mix of levels does not imply anything good or bad about management. The narrative discussion at the end of Table 3 is a summation of information in the table relative to prescription allocation.

131. You are correct in that Alternative C has zero acres assigned to the prescription that emphasizes a combination of dispersed recreation with timber and fuelwood harvest. You are also correct that Alternative C has the highest acres assigned to the prescription that emphasizes game animal habitat along with livestock grazing and fuelwood harvest.

Alternative C produces the most wildlife outputs in terms of RVDs while having no timber harvest and reduced fuelwood harvest. However, the additional RVDs relative to other alternatives are the result of substantial increases in direct wildlife habitat improvement projects (43,400 acre equivalents annually) relative to other alternatives. While timber and fuelwood harvest do produce wildlife benefits, the suitable acreage for these activities is approximately 1,000 acres annually at best.

132. The acronym PAOT is explained in the Reader's Guide (pages 10-12), along with RVDs, MBF, MCF, and AUM. This in turn refers the reader to the Glossary for a complete definition.

We agree an explanation of acronyms would be helpful for Table 4 and have included this in the FEIS.

133. See response number 5.

134. We agree and have included the specific page number.

135. The typographical error has been corrected.

136. The narrative discussion on page 41, DEIS is intended to summarize the resolution of ICOs as shown in Table 4. The statement that Alternative C gives emphasis to recreation opportunities and wildlife habitat..." is a statement of fact and no anomaly (irregularity) of the computer (FORPLAN) program. This emphasis results from using an objective function to maximize present net value. Because of the high values assigned to recreation opportunities, including wildlife opportunities, Alternative C emphasized these resource outputs.

The statement on page 20 of the DEIS that says "Alternative C is similar to the benchmark called Maximize Present Net Value of Assigned Values" is true. The emphasis of Alternative C is on economic efficiency as determined by present net value. As stated above it is economically efficient to spend on recreation and wildlife improvement.

We disagree with your assumption that the Forest Service does not acknowledge the economic value of recreation opportunities. The reality is that we can not fund all of these improvements even though they produce benefits in the long run. If recreation and wildlife users of the Forest were to pay a fee to the U.S. Treasury equal to the benefit values used in the analysis, this situation might be changed.

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Alternative C is a legitimate alternative when compared to the Proposed Action or any other alternative when considering technical feasibility. When financial constraints are added to Alternative C or any other alternative, they will not produce all of the fine things they might have otherwise.

137. Information contained in new Tables 3, 4, and 54 of the FEIS show the PA with approximately two percent (23,000 acres±) more acres available for grazing. These changes were highlighted in response number 91 and 92.

The PA also has approximately three to four percent less grazing capacity and use than do Alternatives C or D by the fifth period. The difference in the first period is less than one percent.

The difference in grazing capacity and use, especially by the fifth period, is primarily due to more acres grazed at Level B in the PA than Alternatives C or D. The forage available to livestock (capacity) under Level B management is substantially less by the fifth period than is true for management Levels C or D. This is based on prior knowledge that budget constraints placed on other alternatives, such as Alternative D, result in additional allocation of low management intensity prescriptions. These low intensity prescriptions in turn result in substantially lower costs and resource outputs such as grazing use or capacity.

By the fifth period, livestock use and forage available to livestock (capacity) are the same. More Level D management is prescribed in the PA than Alternatives C or D and is concentrated in the more productive and efficient rangelands in an attempt to offset the differences in capacity and use because of reduced grazing use (and related costs) on less efficient rangelands. This effort does not totally offset the three percent difference in total capacity.

We recognize this may not be a total answer to your question. Because of the complexity of the planning model there may be other interactions affecting these differences such as grazing capacity variations between ecosystems shown as suitable rangeland in different alternatives.

The model seeks economic efficiency based on total costs and benefits assigned to each management prescription and not on separate resource components, such as range management costs. The total estimates made regarding management levels and use or capacity are predictions of applying the various management prescriptions. These estimates are, of course, most accurate for the first period (Plan period) and much less reliable by the fifth period. As implementation and monitoring take place, the most effective and efficient application of the range management component of these prescriptions will be sought on individual areas, whether it be Level A, B, C, or D range management intensity. This is the intent of the range management standards and guidelines of each Management Area.

138. The purpose of Tables 10 and 11, DEIS was to compare one alternative to another in relation to their costs and benefits separately and not to directly compare costs to benefits. Table 12, page 49, DEIS, has a comparison between discounted benefits and discounted costs by the categories you suggest.

139. The fourth column in Table 12 which is labeled Alternative D, should be labeled Alternative E. The other columns are correctly labeled. This correction is included in the Final EIS.

140. All wildlife benefits are shown as wildlife RVDs whether they accrue due to direct wildlife habitat improvement or to indirect improvement from fuelwood harvest or rangeland improvement. The direct values used for fuelwood or timber products only include the actual product value in terms of wood volume sold. The wildlife or recreational values of wood harvest are included within total RVDs from all sources. The RVDs and other resource outputs are tied to each total multiple use prescription.

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Because of this one must use some judgement in comparing individual resource benefits and look at total benefits of a prescription or alternative.

Alternative C provides for a substantial amount of direct wildlife habitat improvement which results in increased wildlife benefits (RVDs). The reduced timber and fuelwood harvest in Alternative C does reduce the wildlife RVDs but not enough to offset the increase. Timber and fuelwood harvest only affect, at best, less than one percent of the total Forest acres in any one year.

141. See response number 136.

142. The broadleaf woodland is the oak woodland. The vegetative types used are described in Appendix A of the Draft Forest Plan.

143. Since the Wilderness Study Area boundaries were developed by input from many parties, it is our position that the intent of Congress and the public was not to study wilderness options for roadless areas outside these boundaries unless there was sufficient reason to do so. We also took this intent to mean roadless areas adjacent to the WSAs.

144. We will add the javelina to the narrative discussion and delete the Tarahumara frog as you suggest.

145. See response number 85.

Also we do not feel the mountain lion is a necessary management indicator species at this time.

146. Recreation livestock for the purpose of the Forest Plan is any animal ridden by people for the purpose of recreation. The most common animal is horses.

147. We have included sedimentation as a potential pollutant of waterways. Under certain circumstances sediments can have the same effects as the "normally" recognized pollutants. Refer to Water Quality Standards for Surface Waters in Arizona, State Department of Health, Water Quality Control Council.

148. High Peak (Mt. Graham Peak) has been identified possible electronic site need. Heliograph is identified as an existing electronic site.

149. We revised reference to the proponents of the Mt. Graham Astrophysical Area.

150. Table 35, DEIS is referenced within the narrative on page 82, Special Uses, DEIS. The table is a summation of different types of nonrecreational special uses now existing on the National Forest. Specifics regarding all special use permits are available at the Coronado National Forest Supervisor's Office. We have added a table lead in since the reference is hard to find.

151. Thank you for pointing out the inconsistencies in the two tables. Another error occurred in the case of Ramsey Canyon which was in Table 37 and not 69. These corrections have been made in the Final EIS. The Mt. Graham wet meadows have been dropped because they will be considered in the EIS for the proposed Mt. Graham Astrophysical Area.

152. The development of recreation sites involve construction of facilities including roads. The presence or absence of roads alone have the greatest effect on the ROS classification given to a specific area of land. Thus if recreational facilities were developed in an area now unroaded, it could change the classification of a large area from nonmotorized to motorized.

Agency response to Arizona Game and Fish Department (continued)

Table 40, DEIS does not reflect any significant shifts between ROS classification for any alternative. This is due to the relatively limited recreational development opportunity and limited amount of new wilderness classification.

153. This suggestion is contrary to established Southwestern Regional policy which states that roads open to use will be signed. See response number 22.

154. We disagree that none of the maps with the DEIS allow the reader to locate the various Wilderness Study Areas. The actual WSA boundaries are represented on the Alternative A (current direction) map while the other maps present the actual area to be recommended for wilderness under each alternative. The case in point with Whitmire Canyon under Alternative C is a mapping error that has been corrected in the Final EIS. The actual differences in boundaries between Alternatives C and D is hardly noticeable at the scale used.

Maps directly related to the wilderness issue were and are available in Technical Reports of each WSA. More detailed maps are also available for review.

155. See response number 5.

156. The methodology involved the judgement of Forest Wildlife Biologists based on their knowledge of the management prescriptions allocated to each alternative and effects thereof.

157. The purpose of the discussion in the section you refer to was to talk about relative emphasis of all wildlife for each alternative. It was not intended to discuss each and every wildlife group.

158. We have added Pena Blanca Lake with the stipulation that Arizona Game and Fish Department plans to renovate it.

159. Satisfactory range condition includes the U.S. Forest Service condition class ratings of fair, good, and excellent. The term satisfactory condition has also been defined as "at least a moderately high ecological condition." A moderately high ecological condition is 50 to 75 percent of potential production and equates to a fair range condition class rating.

160. The statement was used in the context of establishing potential environmental consequences. The first part of the statement "while there is only a slight difference in grazing impacts by domestic and wild animals" means that the actual impact to a particular plant is the same whether a wild animal or domestic animal eats it. This assumes the same amount of the plant is consumed. The last part of the statement "the partitioning of forage to livestock can conflict with wildlife use" relates to the tradeoff between wild and domestic animals when it comes to utilization of the plants. For example, if a large portion (55 percent or more) of herbaceous vegetation (grasses) is allocated as food for livestock, it could have an impact on cover requirements for Mearn's quail. Another tradeoff example is in the case of actual food requirements between antelope and livestock. If a decision is made to graze a large number of livestock on a range, it could affect the number of antelope because of direct conflicts for the same food source.

161. We do not understand how you arrived at your assumption that a significant portion of the Forest is planned for mesquite fuelwood harvest. Paragraph one (Fuelwood) clearly states where most fuelwood would come from under any alternative.

162. See response number 5.

163. The improvements include the same types as shown in Table 16 of the Draft Forest Plan (page 35). The difference is there would be more of them for Alternatives C and D as you have noted. The relative costs of the wildlife resource job is reflected in Table 12, DEIS (page 49). All costs would be Forest Service costs. The direct benefit to wildlife are the increased

Agency response to
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(continued)

wildlife recreation visitor days. The estimated acres of improvements are based on the prescription allocation for each alternative.

164. The wildlife and plant diversity standards and guidelines were revised to reflect a percent of the stand to be retained in each age class rather than a percent of canopy. There is no reason to define a height class diversity for canopy cover as you suggest.

165. General Comment:
The economic analysis procedures used are unfairly biased in favor of commodity production. Benefit values assigned for wildlife-related activities are significantly undervalued.

Specific References:
Page 14

- "The $16.90 value for a Wildlife-Fish User Day is unrealistically low..."
- "Only the portion of time a hunter and/or fisherman spends actively hunting or fishing is given any value. The time spent driving, camping, resting, scouting, birdwatching, while on a hunting or fishing trip, is not assigned any value as a wildlife-related activity and apparently is not given any value in the recreation section of the Plan."
- "All the values, except waterfowl hunting, for willingness to pay in the Draft EIS of the Resource Planning Act are well over the $16.90 figure used in the Coronado Plan..."
- "Although these values (RPA values) were reduced for questionable reasons and by questionable methods...it still produces a value of $19.00 per recreation day."
- "It is remarkable that these gross expenditure estimates (USFWS Survey) are higher than values fixed in the Coronado Forest Plan DEIS."
- "Forest Service economists have stated 'total value of a resource is equal to expenditures plus net value over and above expenditures'...why is the value assessed in the Coronado Plan far below expenditure values?"

Page 15

- "The RPA values have apparently been arbitrarily reduced by at least 37.5 percent...The CHEC report states that 'the RPA values are being deliberately skewed against recreation resources'...This seems to be a very valid criticism of both the RPA DEIS and the Coronado DEIS..."

General Response
We do not agree with your statements concerning wildlife benefits and the computation of user days. In addition, we find your conclusion surprising for two reasons.

a) Your Department's view that gross expenditure estimates should be equivalent to benefit values in efficiency analysis is incorrect. Our conclusion is based upon the well-documented support for our position found throughout the economics literature on this subject. Much of the current literature on the subject draws from a well-known, landmark study funded by The Arizona Fish and Game Department more than ten years ago (see Martin, et. al. 1974, Project FW-11-R). This publication contains an excellent summary of the "consumer surplus" valuation approach used by the Forest Service as well as an explanation of why expenditures are inappropriate as benefit value estimates.

b) The procedures the Forest Service used to compute wildlife user days are well established and have not changed for several years.

Before responding to specific points, we would like to briefly explain the procedures used to arrive at the benefit values and the number of wildlife user days.

Agency response to
Arizona Game and
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(continued)

Basic Definition of Economic Value:

Economic value for recreation used in Forest Planning is based upon the net amount, in excess of their actual expenditures, that consumers are willing to pay for a resource. In conventional economic theory, this value is called "consumer surplus." Net willingness to pay, or consumer surplus, is the standard measure of value in benefit/cost analysis performed by the U.S. Forest Service, the U.S. Army Corps of Engineers, the Bureau of Reclamation, the Soil Conservation Service, the Bureau of Land Management, many State government agencies, and others.

The most commonly used technique for estimating users' net willingness to pay for recreation is the "Travel Cost Method." A brief description of this technique will be used to illustrate the concept of consumer surplus. The "Travel Cost Method" relies on variations in travel costs of recreationists to trace out a demand curve for a particular type of recreation experience. The demand curve is usually downward sloping and to the right of the origin, depicting an inverse relationship between quantity demanded and price. The total area under the demand curve may be thought of as the total, or maximum, willingness to pay ("total benefit"). In order to arrive at a net benefit value, the consumer's travel costs must be deducted from this total benefit measure. The area under the demand curve, but above actual travel costs, is a measure of net willingness to pay, or consumer surplus. As can be seen, consumers' actual expenditures do play a role in this estimation process; however, they are a part of the "cost" side of the equation, not the net "benefit" total.

Based upon this kind of valuation concept, the use of actual expenditures by hunters and fishermen is not appropriate as benefit values for valuation of wildlife. Expenditures are useful only for measuring the effect of impact on local economies of some resource management action. The reason for not attributing the indirect spending impact as part of the value of recreation is that the recreationist would have spent his money doing something else (or simply saved it), with an equal indirect impact somewhere else. The impact of the recreationist's expenditure on the local community is thus a transfer of spending from one place to another rather than a net addition of value. Use of gross expenditures as a measure of value would actually lead to maximizing inefficiency instead of efficiency. That is, if gross expenditures were used as a measure of value, new recreation sites would be located as far away from population centers as possible, so that people would have to incur large expenditures to get there.

The following brief list of references provide additional detail on this concept of "economic value."

Brown, Thomas C. 1982. Monetary Valuation of Timber, Forage and Water Yields from Public Forest Lands. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-95.

__________. 1984. The Concept of Value in Resource Allocation. Land Economics 60(3): 231-246.

Donnelly, Dennis M., John B. Loomis, Cindy F. Sorg, and Louis J. Nelson. 1985. Net Economic Value of Recreational Steelhead Fishing in Idaho. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-9.

Hansen, Christopher S. 1977. A report on the Value of Wildlife. U.S. Department of Agriculture, Forest Service, Intermountain Region, Ogden, Utah.

Martin, William E., Russell L. Gum, and Arthur H. Smith. 1974. The Demand For and Value of Hunting, Fishing, and General Rural Outdoor Recreation in Arizona. Technical Bulletin 211. The Agricultural Experiment Station, University of Arizona, Tucson.

Agency response to Arizona Game and Fish Department (continued)

Rosenthal, Donald H., John B. Loomis, and George L. Peterson. 1984. The Travel Cost Model: Concepts and Applications. U. S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-107.

Ward, Frank A. 1982. The Demand For and Value of Recreational Use of Water in Southeastern New Mexico. Research Report 465. The Agricultural Experiment Station, New Mexico State University, Las Cruces.

Calculation of Benefit Value for Coronado:

The $16.90 value for hunting and fishing used for the Coronado is the result of a calculated weighted average using established RPA benefit values for big game use, small game use, and resident fishing use. The nongame wildlife use value of $22.76 is taken directly from the RPA estimates. The benefit values used are those in use for the 1985 RPA Program as of October, 1983. The use of these benefit values is mandated by National Forest Service policy. The weights used are taken from the 1980 Arizona Game and Fish Department data. The base data and calculations are shown below (the one cent difference in totals is apparently due to rounding differences).

	1985 RPA Benefit Value (Jan. 1, 1982 $)	Benefit Value (4th 1980 $)	Percent of Use	Weighted Values
Big Game	30	27.31	19.2	5.24
Small Game	18	16.39	46.1	7.56
Fishing	13	11.85	34.7	4.11
			Weighted Benefit Value	16.91

The nongame wildlife use uses the RPA benefit value of $22.76 ($25 in January 1, 1982 dollars). The overall result of using these benefit values can be calculated using the total wildlife outputs (Table 9, p.44, DEIS) and the total wildlife benefits (Table 11, p.47, DEIS). For the Proposed Action alternative, the average wildlife benefit value is $18.52 in 1980, 4th Quarter Dollars. Other alternatives are only slightly different.

Brief Description of Wildlife-Fish User Day Concept:

The primary method used to estimate wildlife and fish user days is State game and fish statistics. Under existing Forest Service policy, an RVD is twelve hours of a particular activity on the Forest by one person. Thus an individual's fishing trip of three hours' duration with one hour spent picnicking or hiking and the remainder actually fishing would be estimated as 1/6 of an RVD fishing (2 hrs./12 hrs.) and 1/12 of an RVD picnicking or hiking (1 hr./12 hrs.). Obviously, under this system, the amount of time spent by the individual packing his lunch at home, tying his flies or purchasing bait, or driving to the Forest boundary is not included in the RVD estimate. Hopefully, however, the total amount of time spent recreating on the Forest is captured somewhere in the Recreation Information Management (RIM) system. The benefit values used in Forest planning are based upon the same notion of a twelve hour RVD of a particular activity. Thus, the benefit values for hunting, fishing, developed recreation, dispersed, etc. are all different (for example, a big game RVD is valued about three times more than a picnicking RVD). Admittedly, the present Forest Service system (RIM) is cumbersome and abounds with measurement problems; however, short of actually counting every Forest visitor, it is unlikely that some other, better system could be implemented by an individual National Forest. It is appropriate to point out that this is the same procedure used by the Forest Service throughout the Nation.

Agency response to
Arizona Game and
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(continued)

The fact that the Coronado attempts to estimate wildlife user days based upon the amount of time actually spent on the Forest engaging in that particular activity is the result of long-standing Forest Service policy and is the basis for our benefit estimations as well. If we did not make this distinction, we might indeed show a greater number of wildlife user days; however, we certainly would not apply the same benefit value as for hunting and fishing alone. The amount of time spent by users not actually hunting or fishing is accounted for by our estimates of developed or dispersed recreation (even time spent driving on Forest Service roads is included in our dispersed estimates).

Specific Responses:

On p. 14 of your detailed comments, you state that "the $16.90 value for a Wildlife-Fish User Day is unrealistically low." We do not agree. As shown earlier, this value was calculated using the established RPA benefit values and the actual Coronado estimates for wildlife use. The actual average value in the Coronado analysis per user-day is about $18.50. In addition, it was explained earlier that the expenditure estimates (which may be quite high) are not comparable to the benefit values.

Also on p. 14 you state that "only the portion of time a hunter and/or fisherman spends actively hunting or fishing is given any value." As explained earlier, this is incorrect. The procedures used by the Coronado are an attempt to account for all recreation time spent on the Forest. Time spent actually hunting and/or fishing is valued at about $18.50 per day; developed recreation is valued at about $8.60 per day and dispersed recreation is valued at about $11.43 per day.

Elsewhere on p. 14 you point out that the benefit values used are smaller than some of those shown in the 1985 Draft RPA EIS. The table which you are apparently referring to does not contain "benefit" values and is not labeled as such. The benefit values used for the Coronado are clearly identified in Table F. 2 of this document. As demonstrated earlier, the values in Table F. 2 were adjusted to 4th Quarter 1980 dollars and used in the Coronado FORPLAN model. No other adjustments were made by the Coronado.

On p. 14 you state that RPA values "were reduced for questionable reasons and by questionable methods." Apparently your comments are directed toward the procedure used to estimate the wildlife program benefit values for the 1985 RPA program (as shown earlier, the Coronado's were estimated using these established 1985 RPA values). In our opinion, this claim is groundless. The wildlife values estimated and the procedures used for the 1985 RPA Program are clearly outlined in the EIS for the 1985 RPA (January, 1984). The values and the rationale used are shown in Appendix F of this document (see especially pp. F-10 through F-12). The use of qualified professional judgment to establish these benefit values is in no way "arbitrary" in a legal or professional sense.

In addition, your position that the RPA Draft EIS and the Coronado DEIS are "deliberately skewed against recreation resources" is unsubstantiated. This implies that the staff of the Coronado National Forest has failed to fully consider the important role that recreation plays on this Forest. Since there is no factual basis offered to support this claim, and much evidence to the contrary in the Coronado EIS, we cannot agree with your conclusions.

On p. 14 you note that gross expenditure estimates are higher than the benefit values used in the Forest Plan. As pointed out earlier, the belief that expenditures should be equivalent to the benefit values in efficiency analysis is not supported by conventional economic theory.

Agency response to Arizona Game and Fish Department (continued)

Also on p. 14 you state that the benefit value used should be at least $19 per recreation day. As shown earlier, the value used for the Coronado was calculated correctly. The value used on the Coronado is $18.50 per user day.

The statements which you attributed to "Forest Service economists" concerning the "total value of a resource" are taken out of the context in which they were presented. A more thorough examination by your economics staff of the article, and other references cited there, will reveal that your interpretation is incorrect. The correct basis for estimating benefit values for efficiency analysis is "net value over and above expenditures."

Summary Conclusions:

In summary, our review of the procedures and actual values used to estimate the wildlife recreation benefit values for the Coronado National Forest does not indicate a need to revise these values. While it is true that the benefit values used for the Coronado are based on the established 1985 RPA Program benefit values, no convincing evidence has been offered which would indicate that these values are unreasonable or inappropriate. The procedures and values used by the Coronado National Forest are consistent with the direction used throughout the National Forest System. Based upon our review, we must conclude that the benefit value used is appropriate and was estimated based upon a correct interpretation of the procedural instructions issued by the Regional Office.

In addition, we have reviewed the RVD estimates used for the Coronado and have concluded that the procedures used were appropriate in terms of existing Forest Service policies Nation-wide. Our review does not indicate a need to revise these calculations. No convincing evidence has been offered which would indicate that these values are unreasonable or inappropriate.

0703

The Arizona Nature Conservancy

30 North Tucson Blvd./Tucson, AZ 85716/(602) 327-4478 or323-1857

October 9, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 1[illegible] 1985
RECEIVED

Mr. R. D. Tippeconnic
Coronado National Forest
300 W. Congress Street
Tucson, AZ 85701

Dear Mr. Tippeconnic:

With the passage of the National Forest Management Act in 1976, a great opportunity was afforded the public to voice their opinions concerning National Forest management. In full appreciation of this opportunity, The Arizona Nature Conservancy is pleased to enclose comments and suggestions concerning the Proposed Coronado National Forest Plan.

The Arizona Nature Conservancy (with 6,000 active members), is a local chapter of The Nature Conservancy, a national non-profit organization committed to the task of preserving biological diversity through long-term protection of rare plants, animals and exemplary natural areas. To assist in this task, The Nature Conservancy has developed in Arizona, as well as in 42 other states, a State Natural Heritage Program. This program is a comprehensive, computer-assisted ecological inventory designed to provide specific information regarding the existence, location, status (e.g. exemplary,endangered, threatened, state or federally listed), condition and numbers of particular natural communities and species.

Established in Arizona in 1979, this program has collected and computerized a substantial amount of ecological information which we have used to target, from a global and state perspective, those rare elements on the Coronado in need of protection. Recognizing the desire of the Coronado National Forest to "preserve and enhance natural diversity of plant and animal communities" (36 CFR 219.27 g), we feel this information can be of great benefit in assuring that the Forest's diversity objectives are met. With this in mind, please consider the enclosed comments on the Proposed Coronado National Forest Plan formulated through review of our Natural Heritage Data Base.

Thank you for the opportunity to participate in the forest planning process. If you have any questions concerning these comments, The Nature Conservancy, or the Arizona Natural Heritage Program please feel free to call me in Tucson at 602-327-4478.

Sincerely,

Andy Laurenzi

Andy Laurenzi
Public Lands Protection Planner

National Office/1800 North Kent Street/Arlington, Virginia 22209

cc: Dan Campbell, Director, Arizona Nature Conservancy
Curt Soper, Preserve Design & Selection, Western Regional Office
Regional Forester USFS Region 3, Attn: RNA Committee

3. Summary of the Analysis of the Management Situation

Page 13. Wildlife and Fish

Consider rewording Paragraph 2 of this section to read: "A major wildlife objective was to select species which would serve as an indicator to assure the maintenance of viable populations of existing native and non-native plants and animals. FSM 2621.1 Planning Actions-Identification of Purpose and Need clearly states the rationale for identifying management indicator species.

Conclusion paragraph point 5) should read "wildlife habitat diversity sufficient to at least maintain viable populations of management indicator species.

Page 19. Research Natural Areas should be titled Special Management Areas so as to also include an AMS for Zoological -Botanical Areas. Given their inclusion as an ICO, their omission from Chapter 3 was puzzling.

Future trends paragraph should make reference to the realization that with increased study and knowledge gained, areas of unique natural history values will continue to be identified. Due to increasing population and future resource needs specific management guidelines may have to be established on these areas to insure that unique natural history values are maintained.

1

Conclusion paragraph should read "In order to meet RNA targets assigned to the Forest, to fill gaps and deficiencies oulined in the regional RNA report and to adequately represent the range of forest diversity, suitable candidate areas have been and will continue to be studied for possible inclusion in the RNA system." It is important to note that the September 1984 Southwest RNA progress report states on page 6 of the Job Ahead that "Foremost, we feel, is the continuing task of looking for and finding suitable areas for inadequately represented ecosystems." The report also states that "we do not imply that other candidate RNAs will not surface in the future--- our Forest lands are simply too diverse." Your statement (as currently worded), implies a certain finality regarding RNA establishment. The process of identifying and establishing RNA should be viewed as a dynamic one, dependent on future awareness and increased knowledge.

Likewise, mention should be made of the need to continue to identify areas of unique natural history values and to give consideration to establishing specific management area guidelines to assure protection of these values through formal designation as Special Management Areas (FSM 2300).

1 Expected Future Condition should include a complete listing of proposed Zoological-Botanical Areas.

4. Management Direction

Page 23. Wildlife and Fish (C)

2 Paragraph 2 of this section might be best stated as "Provide for ecosystem diversity by at least maintaining viable populations of all native and desirable non-native wildlife,fish and plants through improved habitat management (FSM 2602-Objectives).

PAGE 42-43 Management Practice DU10. Activities C01,C02,C12.

3 We commend the Coronado for their frequent mention of cooperation with federal, Arizona and New Mexico wildlife agencies. We cannot overemphasize the importance of this outside consultation process with regard to state Fish & Game Departments. As a concerned private organization we rely heavily on their expertise in assuring the continued existence of sensitive species populations. This is not to imply that the Forest lacks the necessary expertise in these areas but considering the resources and manpower available to these agencies which is dedicated to fish and wildlife, their input whenever possible can only aid in achieving Forest goals and objectives concerning fish and wildlife issues.We would like to suggest that on an annual basis management activities and proposed projects be reviewed with these agencies so as to address well in advance potentially negative impacts on sensitive plants, animals and unique natural areas.

4 Point 7 could be more completely stated as "Determine presence of federally and state listed threatened and endangered plant and animal species in project areas through on-site inventory and consultation with existing data bases (e.g. State Heritage Data Base), prior to environmental assessment completion."

5 In Point 8 we would prefer more specific mention as to the value and objectives of directional plans for state and federally listed threatened and endangered species. Using 36 CFR 219.19 Paragraph 7 as a guide we suggest rewording as follows "This directional plan would guide habitat management on the Coronado National Forest by: (1) determining critical habitat for threatened and endangered species and prescribing measures to prevent the destruction or adverse modification of such habitat; (2) recommending appropriate conservation measures including the designation of special areas to meet the protection and management needs of such species; (3) prioritizing completion of recovery plans on memorandum of understanding by species; (4) establishing a time frame for (3) above.

6 Our last recommendation concerning this section is that a paragraph be added to DU 10 which specifically refers to Management Indicator Species and the role they are to play in guiding forest management. FSM 2621.1

6 indicates that Management Indicator Species shall be identified to assure the maintenance of viable populations of exisiting native and non-native plants and animals. The Coronado should, through consultation with Arizona Game and Fish, New Mexico Departments of Game & Fish and Natural Resources along with other wildlife and plant-oriented groups where appropriate, evaluate population viability of Management Indicator Species through determination of (1) amount of suitable habitat; (2) distribution of suitable habitat; (3) number of individuals that support regional population goals; 4) likelihood of continued existence. These should be clearly stated as Standards and Guidelines under Management Practice DU 10.Although many of the specific management practices listed in Appendix C. will be done with the idea of maintaining or improving management indicator species habitat, it is our belief that until species-habitat models are developed from information acquired through the aforementioned determinations,the value of these management activities in assuring species population viabilty will be subject to question.

7 Please note that the New Mexico Department of Natural Resources is responsible for plant resources in the Pelloncillo Mountains and maintains a New Mexico Natural Heritage Data Base on plants and natural communities. Please include them in the list of consulting agencies mentioned in this section.

6. Monitoring Plan

8 We are concerned that time and resources committed to monitoring of threatened and endangered species are woefully inadequate. By their very nature T & E species involve a high cost if the Forest is not successful (i.e. extinction) and a high probability of the Forest not being successful due to their potentially fragile ecology and limited occurrence. Because of such a high risk analysis T&E populations need to be monitored much more carefully. This is particularly critical with regard to plants.

At present, no Arizona state agency appears to be conducting any scientific field study on sensitive plants. As a result, Coronado Forest cannot rely on an Arizona state agency to monitor plant species populations but instead must be willing to commit funds for contracts to outside agencies or professionals. We are well aware of the Coronado National Forest's letting of outside contracts to organizations and professional botanists in the past. These actions are highly commendable and we encourage the Forest to continue this practice and to make specific reference to this need on Page 94 Point 8 Evaluation paragraph 3. An actual dollar figure should be broken out specifically for T&E plants and T&E animals. Of the 117 federally-listed and USFS Sensitive plants for the Southwest region, the Coronado includes over half. Our data indicates that the Coronado contains more sensitive elements than any other National Forest in the nation. We feel it is extremely important that the public be aware of the funds committed by the Forest to assure that these valuable biological

8 resources are monitored adequately.

MANAGEMENT PRESCRIPTIONS

7A/B

We commend the Coronado National Forest on their acknowledgement of the importance of riparian areas in maintaining biological diversity. We are most pleased with your development of a separate management prescription for these areas rather than including their management within the body of other management prescriptions. While reviewing this prescription along with the proposed plan map, we noticed one problem area.

9 Page 70 Management Practice DU 16 indicates that rangeland be managed at level D, if that level is not achievable then areas will be managed at level A. Page 82 Management Practice DU 16 indicates that wilderness areas are managed at levels A, B and C. The corollary we drew is that riparian areas in Wilderness Areas will be managed at Level A. If this is not the case we suggest that riparian areas be managed at Level D without an increase in grazing use levels above A, B or C.

10 The following area should be designated as 7 on the proposed plan map:

Red Rock Canyon-Patagonia Mountains	Area 11
Holden Canyon-Atascosa Mountains	Area 10
Goudy Canyon-Pinaleno Mountains	Area 3
Carter and Nuthall Canyons-Pinaleno Mountains	Area 3
Casa Blanca Canyon-Santa Rita Mountains	Area 7

8 and 8A

The Nature Conservancy strongly endorses the Coronado's consideration and designation of areas for Research Natural Areas. Through their national office directives (FSM 4063), the Southwest Region's 1984 progress report on RNAs, and local forest implementations of regional recommendations in the planning process, the United States Forest Service has exhibited a committment and willingness to act on that committment, far exceeding any other federal agency in embracing the Research Natural Area concept. For this action we are very appreciative. The importance of these areas as ecological benchmarks from which to evaluate management activities as well as their importance as gene pool reservoirs is inestimable. The consideration afforded these areas today by the Coronado will be appreciated to an ever increasing extent by future generations.

Recognizing the diminished opportunities for future RNA designations as stated on Page 19 under Future Trends, please consider the following comments concerning RNA proposals:

11 We fully support the Canelo RNA and Goodding extension proposals. Because RNAs can also serve to protect sensitive species populations (FSM

11 4063.03), we would like to suggest that the northern boundary of the Goodding be extended slightly as indicated on Map 1. This extension will serve to iclude the largest and best known population (the Heritage Data Base includes only three known localities), of Phaseolus supinus, a currently listed sensitive plant by the Coronado. The population at the edge of the Goodding is currently under study by Russ Buhrows, a PhD candidate at U of A Plant Sciences Department and Larry Toolin under contract to USFWS. The proposed boundary modification is facilitated by a fence at the western boundary. We suggest the drainageway indicated as a natural northern boundary. A short distance north of this drainageway is a second fence which effectively excludes livestock from this area at present. We also recommend that the old jeep trail shown on the map be officially closed as the plant population currently resides very close to the road. Much of the road has been reclaimed by perennial grasses and a road closure will ensure that this continues unabated in the future.

12 Our second recommendation concerning RNA proposals is that the Forest reconsider two areas previously suggested by the Arizona Natural Heritage Program. These areas are listed in Table 37 Page 84 of the DEIS but are not mentioned in the subsequent chapter concerning enironmental consequences (as a note Ramsey Canyon is not included in Table 69 and Pine Canyon is incorrectly referred to as being in the Pelloncillos rather than the Atascosa Mountains, Pages 116-117). This suggests that these areas were not considered adequately for RNA desingation and could be considered at this point. Given the important natural history values of these areas we also suggest that if these areas are not considered appropriate for RNA establishment, they be designated botanical areas as provided for in FSM 2300.

NAME:

Upper Ramsey Canyon (Map 2)

LOCATION:

Canyon north of Carr Peak between Carr and Brown Canyons immediately upstream of the southern boundary of The Nature Conservancy Mile Hi Nature Preserve.

ELEVATION:

5900' - 8300'

PRINCIPLE DISTINGUISHING FEATURES

Well-developed, minimally disturbed oak woodland series association (Shreve's "closed encinal"). Differs substantially from the only other oak woodland series RNA representative (i.e. Canelo RNA-oak savanna).

JUSTIFICATION

1. An exemplary example of a major association of the encinal series which is currently not represented by any other RNA.

2. Exemplary association examples of oak-pine and mixed broadleaf series communities which are currently under-represented in existing and proposed RNAs.

3. A noteworthy assemblage of rare plants.

4. Past history of recent fires in certain areas could faciliate succession studies.

5. Minimal resource conflicts.

6. Opportunity for cooperative management and monitoring agreement with The Nature Conservancy. Many of our monitoring efforts concerning rare plants have extended onto the Forest in the past. Accomodations available free of charge for researchers.

7. A substantial amount of ecological information has been collected already.

DESCRIPTION OF VALUES

Closed encinal association: *Quercus emoryi, Pinus cembroides, and Juniperus deppeana* are dominant species. Important associated species include *Quercus arizonica, Arbutus arizonica, Arctostaphylos pungens* and *Cercocarpus montanus*.

Oak-Pine series association: *Pinus leiophylla chihuahana, P. englemanni* and *Quercus hypoleucoides* are dominant species. Mixed broadleaf series association: *Acer grandidentatum- Platanus racemosa wrightii* are dominant species.

Rare plants:

SPECIES[1]	USFS SENSITIVE	AZNHP RANK[2]	
Asclepias lemmoni		GU	S2
Pinaropappus roseus		GU	S2
Ranunculus arizonicus	YES	GU	S2
Senecio hartwegii		GU	S1
Senecio huachucanus	YES	G1G3?	S1
Ipomoea lemmonii	YES	G1G3?	S2
Lilium parryi	YES	G1G3?	S2
Platanthera limosa		GU	S2
Rumex orthoneurus	YES	G1G3	S1S2
Cheilanthes arizonica	YES	GU	S2

Dryopteris patula rossii		GU	S1
Talinum marginatum	YES	G1G3?	S1
Penstemon stenophyllus		GU	S2
Eryngium lemmonii		G2G3	S1

1. Certain site locations are known only from past collections and have not been recently verified.

2. Explanation of AZNHP Ranks included as an appendix.

NAME

Pine Canyon - Atascosa Mountains (Map 3)

LOCATION

Canyon NW of Ramanote Peak and 2 mi. NE of Corral Nuevo Spring.

ELEVATION

4000' - 6000'

PRINCIPAL DISTINGUISHING FEATURE

Outstanding, minimally-disturbed example of an important oak-pine series association currently under-represented in Southwest RNA system. Particularly noteworthy considering the low elevation occurrence of *Pinus leiophylla chihuahana*.

JUSTIFICATION

1. Provides a more complete representation of this community-type within the RNA system. At present this association is represented as a piecemeal inclusion within an existing RNA (i.e. Pole Bridge). Considering the increased fuelwood demands that woodland habitats are to experience in the future (Page 16 Proposed Plan), consideration should be given to a more extensive representation of the oak-pine series.

2. Isolated, western occurrence may encourage it's use as control site for evaluating recent growth abnormalities reported for Chihuahua Pine in the Huachuca Mountains and hypothesized as attributable to air pollution from area mine smelters.

3. Assemblage of rare plants and a special interest species.

4. Entire watershed in proposed area.

5. Minimal resource conflicts.

DESCRIPTION OF VALUES

Oak-pine association: *Pinus leiophylla chihuahana*, *P.cembroides* and *Quercus hypoleucoides* are dominant species. Low elevation occurrence for *P. leiophylla*. Common associated species include *Quercus emoryi*, *Q. arizonica*, *Q. toumeyi*, *Juniperus deppeana*, *Arctostaphylos pungens*, and *Arbutus arizonica*.

Rare plants:

SPECIES	USFS Sensitive	AZNHP RANK	
Polygala glochidiata		GU	S2
Pectis imberbis	YES	G1G3?	S2
Choisya mollis	YES	G1G3?	S1
Fraxinus gooddingii	YES	G3	S2

Special Interest Species:

Trogon elegans	YES	G5	S3

14

The Nature Conservancy is extremely supportive of the Coronado's proposed use of Zoological-Botanical Area designations. Currently, designation of areas possessing unique natural history values has been little used as a management tool in the Southwest. Given the noteworthy natural history components of the Southwest coupled with increasing population and concommittent resource demands, increased use of special interest area designations can only aid in the Forests' efforts to maintain natural diversity. To assist in this process of identifying areas to be considered for special management designations, we propose the following areas for consideration:

Redfield Canyon Allottment-Galiuro Mountains (see separate comments written by Ken Wiley).

Lochiel- Eastern San Rafael Valley.

Considered by many to be the finest remaining example of short-grass prairie in southeastern Arizona, a portion of the San Rafael Valley grasslands should be considered for designation as a botanical area. Although the area has been grazed, the grasslands have continued to retain their natural perennial grass species composition with minimal invasion by woody shrub species. The area has also been proposed by Arizona State Parks Natural Areas Advisory Council has a state natural area. We refer you to this Park proposal for site location information.

Corkbark Fir Forest - NE-Facing slope of Mt. Lemmon

Corkbark fir (*Abies lasiocarpa lasiocarpa*) is scattered throughout the Englemann spruce-Alpine fir forests at higher elevations in southern Arizona and New Mexico. Rarely does the tree occur as a dominant. The stand on Mt. Lemmon just below the Mt. Lemmon observatory is noteworthy as a nearly pure, disjunct stand. Recently the area was threatened by a proposed ski area expansion which was turned down by the Forest. A botanical area designation would assist in minimizing future impacts related to timber harvest and intensive recreational development.

Page 85 Management Practice DU 16 Point 1. There appears to be an inconsistency with your stated use levels and the prescribed use levels under Levels B and C as stated in Appendix D. We are also somewhat concerned about the grazing levels for Guadalupe Canyon. The riparian corridor in that area is its most noteworthy feature. More specific guidelines may need to be established to insure improvement of the riparian zone.

I. List of Threatened and Endangerd Species and Management Indicator Species.

Page 137. Sensitive Plant Species on the Coronado National Forest.

The following should be included on the sensitive species list. Heritage Data indicates that 2 of these species are rare and may possibly be proposed for federal listing as candidate species. Efforts by the Forest to establish the status of these species in advance of federal consideration could potentially avoid their official listing.

1. *Hermannia pauciflora* Heritage Rank: G2, S1

Status: Regional endemic. May have several populations in Mexico. Known from desert foothills of the Santa Cataina Mountains and the Tucson Mountains. 1984 collection in Finger Rock Canyon in the Santa Catalina Mountains is the only recent collection. Of the remaining 5 collecting localities two may have been destroyed by residential development.

Habitat: Dry desert slopes at ca. 3000'.

2. *Asplenium exiguum* Heritage rank: G2 S1S2

Status: Nearly endemic to Arizona, may have several populations in Mexico. In Arizona known from only two collections. Sycamore Canyon in the Atascosa Mountains and Garden Canyon in the Huachuca Mountains. The Sycamore population has not been recently located.

Habitat: Wet shady spots in canyons in rock crevices. 4000' - 7000' elevation on granite. Habitat of this species indicates a high probability of it occurring on other Forest tracts.

3. *Notholaena neglecta* Heritage Rank: G2 S1S2

Status: Regional endemic known from three locations in Arizona: Whetstone Mountains, Dragoon Mountains (2) and an older record from the Mule Mountains. May have several populations in Mexico.

Habitat: South faces of limestone slopes and cliffs.

4. *Spiranthes michuacana* Heritage Rank: GU S1

Status: Widespread throughout Mexico and parts of western Texas. Known in Arizona from three locations: Rose Creek-Santa Catalina Mountains, Cochise Stronghold-Dragoons and Patagonia Mountains. Only the Patagonia record has been recently recorded (Jack Kaiser). Attempts to locate other populations have not met with success. Rose Creek population may been inundated by Rose Creek Lake.

Habitat: Rocky canyons and slopes, among and under big boulders ca. 6000'-7000'.

5. *Dryopteris patula rossii* Heritage Rank: GU S1

Status: Nearly endemic to Arizona. May have several populations in Mexico. In Arizona known from two locations in the Huachuca Mountains, Ramsey Canyon and Garden Canyon.

Habitat: Moist slopes in canyons at 6000' on quartzite.

5. *Ceterach dalhousiae* Heritage Rank: G2 S1

Status: Nearly endemic to Arizona, may have several populations in Mexico. 4 collecting locations in Arizona. Population in Golden Eagle Box Canyon in the Mule Mountains is believed extant.

Habitat: Shaded moist soil and rocky canyons from 4000' - 6000'.

APPENDIX

An explanation of the ranking system used by The Nature Conservancy for "elements" of natural diversity (rare species and exemplary natural communities).

Each element is assigned a single global rank and a state rank for each state in which it occurs. State ranks within each state are assigned by the State Natural Heritage Program and will vary from state to state. Global ranking is done under the guidance of the national Science Department of TNC.

GLOBAL ELEMENT RANKS

G1 = Critically imperiled globally because of extreme rarity (5 or fewer occurrences or very few remaining individuals or acres) or because of some factor of its biology which makes it especially vunerable to extinction. (Critically endangered throughout range).

G2 = Imperiled globally because of rarity (6 to 20 occurrences or few remaining individuals or acres) or because of other factors demonstrably making it very vunerable to extinction. (Endangered throughout range).

G3 = Either very rare and local throughout its range or found locally (even abundantly at some of its locations) in a restricted range (e.g. a single western state, physiographic province) or because of other factors which make it vunerable to extinction throughout its range; in terms of occurrences, in the range of 21 to 100. (Threatened throughout range).

G4 = Apparently secure globally though it may be quite rare in parts of its range, especially at the periphery.

G5 = Demonstrably secure globally, though it may be quite rare in parts of its range, especially at the periphery.

GA = Accidental in North America (i.e. European Cuckoo, Bumblebee Hummingbird, many other bird species).

GE = An exotic species established in North America

GH = Of historical occurrence throughout its range, formerly part of the established biota with the expectation that it may be rediscovered (e.g. Ivory-billed Woodpecker).

GU = Possibly in peril range-wide but status uncertain; need more information. NOTE: This rank should be used sparingly. Whenever possible, assign the most likely rank and add a uestion mark (e.g. G2?) to express uncertainty or indicate a range (e.g. G1G2, G1G3).

GX = Believed to be extinct throughout range (e.g. Passenger Pigeon).

STATE ELEMENT RANKS

S1 = Critically imperiled in state because of extreme rarity (5 or fewer occurrences or very few because of some factor of its biology making it especially vunerable to extirpation from the state (Critically endangered in the state).

S2 = Imperiled in state because of rarity (6 to 20 occurrences or few remaining individuals or acres) or because of other factors demonstrably making it very vunerable to extirpation from the state. (Endangered in the state).

S3 = Rare in state (on the order of 20+ occurrences). (Threatened in state).

S4 = Apparently secure in state.

S5 = Demonstrably secure in the state.

SA = Accidental in state, including species which only sporadically breed in state.

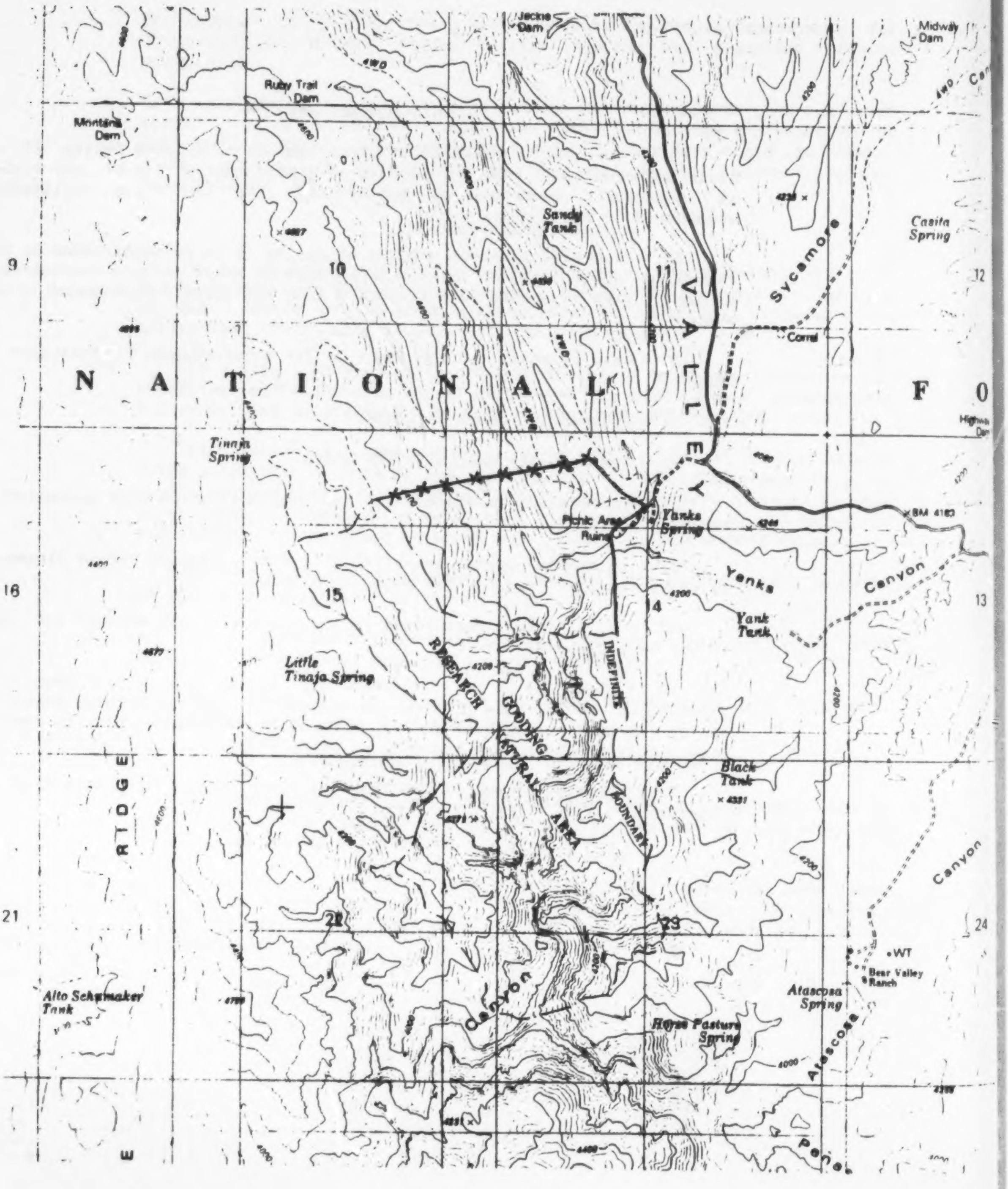
SE = An exotic species established in state; may be native elsewhere in North America (e.g. cattle egret in Arizona).

SH = Of hisorical occurrence in the state with the expectation that it may be rediscovered.

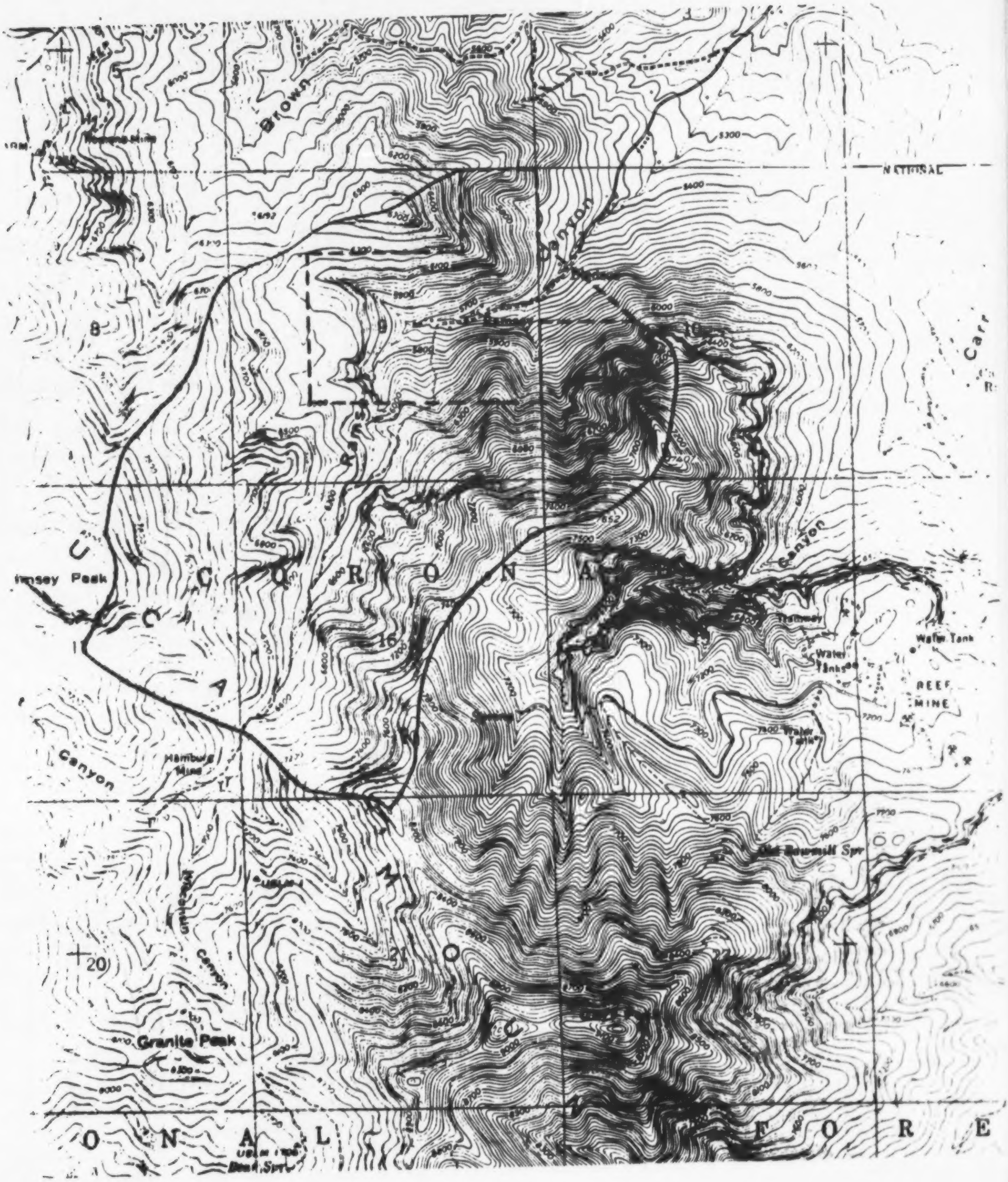
SU = Possibly in peril in state but status uncertain; need more information. NOTE: This rank should be used sparingly. Whenever possible, assign the most likely rank and add a question mark (e.g. S2?) to express uncertainty or indicate a range (e.g. S1S2, S1S3).

SX = Apparently extirpated from the state (e.g. Tarahumara Frog in Arizona).

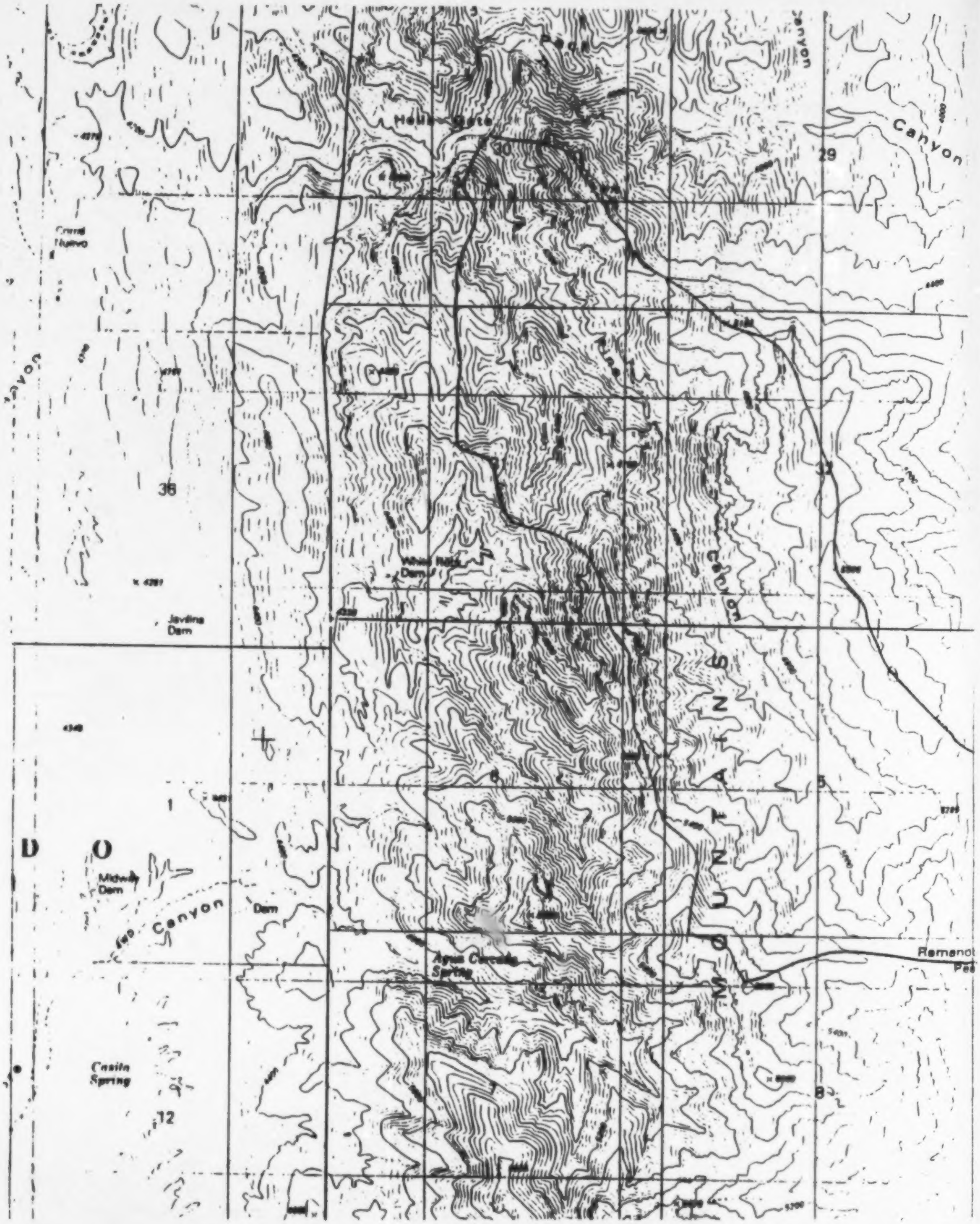
Map 1. Proposed Northern Boundary Modification for Goodding Research Natural Area.


Jeckle Dam
Midway Dam
Ruby Trail Dam
Montana Dam
Sandy Tank
Casita Spring
Sycamore
Corral
N A T I O N A L
F O
VALLEY
Tinaja Spring
Picnic Area
Ruins
Yanks Spring
BM 4183
Yanks Canyon
Yank Tank
Little Tinaja Spring
RESEARCH
GOODDING
NATURAL
AREA
BOUNDARY
INDEFINITE
Black Tank
RIDGE
Canyon
Canyon
Alto Schumaker Tank
Atascosa Spring
WT
Bear Valley Ranch
Horse Pasture Spring
Atascosa
Peñas
9
10
11
12
16
15
14
13
21
22
23
24
4200
4000

Map 2. Proposed Ramsey Canyon RNA (Dashed Lines indicate TNC Preserve Boundary).


Brown
Canyon
Ramsey
NATIONAL
Carr
msey Peak
C O R O N A
Canyon
U
C
A
Water Tank
Water Tanks
BEEF MINE
Canyon
Hamburg Mine
Old Sawmill Spr
M
O
C
Canyon
Granite Peak
O N A L
F O R E
5
8
9
10
16
20
21

MAP 3. Proposed Research Natural Area - Pine Canyon, Atascosa Mountains


Hells Gate
30
29
Canyon
Canyon
Corral Nuevo
Canyon
36
White Rock Dam
Javelina Dam
32
MOUNTAINS
6
5
1
D
O
Midway Dam
Canyon
Dam
Ramanote
Casita Spring
12
8

0703

The Arizona Nature Conservancy

30 North Tucson Blvd./Tucson, AZ 85716/(602) 327-4478 or323-1857

January 21, 1985

CORONADO N. F.
JAN 22 '86

Action X Info V	Init	Action X Info V	Init	Action X Info V	Init	Action X Info V	Init
FS		[illegible]		LA		D	
✓ ASP		[illegible]		[illegible]CH		✓ N	
AO		[illegible]		✓ WL		✓ SV	
ENGR		AS		WS		S	
✓ RGE		CS		[illegible]LS		SC	
RLT		LX		DISP		NARTC	
FIRE		RECP		PIO/IS		COMM	

1-22-86

Mr. J. Mike Borens, Jr.
Coronado National Forest
301 W. Congress
Tucson, AZ 85701

Dear Mike:

Following our recent conversation, I thought that some addiitonal comments on TNC's RNA proposals might assist your evaluation of these sites. Please note below, some of my thoughts on how these areas complement the RNA system as implemented by the Forest Service.

Ramsey Canyon

At present there is only one representative of the the Madrean Evergreen Woodland - Encinal Series in the Southwest Region. This is the Canelo Hills Proposed RNA. In the Southwest region this biotic community occurs predominantly in the Coronado National Forest with minor representation in the Tonto, A-S, Gila and Lincoln Forests. While the Proposed Canelo Hills RNA is an excellent representative of the oak savanna type, it certainly does not fully represent the Madrean Evergreen Woodland biotic community.

One of the more prevalent fasciations of this biotic community is found on sites considerably more xeric than the Canelo RNA. Due to factors related to slope, exposure and soil, oak woodlands on these xeric sites include many elements of chapparal or conifer woodlands. These communities have been previously described by Shreve ("upper encinal and closed encinal") in 1915 and Whittaker and Niering as ("pygmy conifer-oak woodland") in 1965. Their most conspicuous, feature when compared to the open oak savanna type found at Canelo, is the increased importance of pinyon pine, alligator juniper and several chapparal shrubs such as manzanita and squawbush.

Some additional justifications for Ramsey are:

1. Reference area for studies of succession. Although FSM 4062.02 clearly states that an RNA can function as a reference area for the study of succession, virtually none of the existing Southwest RNAs include acreages that have undergone some type of recent natural disturbance. Ramsey Canyon is particularly noteworthy in this regard as it has a rich fire history. The Carr Canyon fire which spread to portions of Ramsey is the most recent example.

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2. Mosaic of types which include oak-pine woodland, mixed-conifer, mixed broadleaf riparian, and a small stand of mountain mahogany on a limestone outcrop. This latter type is a chapparal type found throughput southeast Arizona on limestone between 4000' and 6000'.

3. Another rare species has been documented as occurring in Ramsey Canyon, the nectar-feeding bat *Leptonycteris sanborni*. This species is may be proposed threatened by USFWS.

Pine Canyon - Atascosa Mountains

The oak-pine woodland type is currently represented by Pole Bridge RNA and in the recent draft plan a boundary extension was proposed to include more of the Chihuahua Pine type. Our opinion is that the proposed extension does not adequately represent this type due to the rather limited acreages in Pole Bridge even considering the proposed boundary modification. This habitat type is widespread in the Coronado and also occurs in the Tonto and A-S Forests. The Pine Canyon site is particulerly noteworthy because it does not include any Apache Pine. Together with the Pole Bridge RNA the Madrean oak-pine type would be very well represented in the region.

Please consider these points in your review and do not hesitate to call me if I can provide additional information or answer any questions. If you can afford the time, I would welcome the opportunity to visit these sites and illustrate some of my points in the field. Thank you for your time and the opportunity to provide input into the Research Natural Area program.

Sincerely,

Andy Laurenzi

Andy Laurenzi
Public Lands Protection Planner

Agency response to
Arizona Nature
Conservancy

1. We agree with all of your suggestions for rewording various sections of Chapter 3 (Analysis of the Management Situation) of the Draft Plan. However, it has been decided to condense this section of the Plan because of a tendency on the part of some individuals to confuse this section with the proposed management direction. Much of this same information is duplicated in Chapter 3 of the EIS. We will include your recommendations on wording in the Final EIS as appropriate.

2. We agree and have used your recommended wording in the Final Plan.

3. We currently hold annual meetings with Game and Fish agencies in both States and intend to continue. Other agencies are consulted with on a case by case basis. The most effective coordination occurs at the local level between on-the-ground managers.

4. We agree and have used your recommended wording in the Final Plan.

5. We agree and have used your suggested wording in the Final Plan.

6. We have incorporated your suggested addition to the Final Plan.

7. We have included the New Mexico Department of Natural Resources as a consulting agency.

8. We share your concern for the unique flora and fauna of the Coronado, and recognize that we are blessed with a truly unique biota. As you note, the Coronado has historically been in a position of leadership in the inventory, evaluation, and protection of sensitive plants, and we certainly intend to continue that effort. The Forest Plan is constrained in the amount of investment allowed overall. The realistic outlook is that federal funding will continue to decline in the foreseeable future. Thus it will be difficult or impossible to do all the things that we would like to in this important area. Our commitment to the botanical resource remains strong, but we will constantly have to set priorities of the limited financing and continue to rely on outside help. We do not think it is appropriate at this point to break out costs between T&E plants and animals. The additional data from research will help determine where the priorities need to be established.

9. We have added additional wording to the range management guidelines for Management Area 9 to indicate riparian areas within wilderness areas will be managed intensively to maintain or improve riparian conditions or not grazed at all.

10. We will add the riparian areas to the Final Plan map as you have suggested. Keep in mind, the portions of those drainages that are in wilderness areas will not be mapped separately. Other riparian areas that we have identified and field checked since the last Draft Plan will also be added.

11. We appreciate your support of the Coronado's RNA program and more specifically your support of the Canelo and Sycamore Canyon (Goodding extension) proposed additions.

    We reviewed your request to extend the boundary of the Goodding RNA to include the population of Phaseolus Supinus. The jeep road you mention is still used periodically for management purposes as well as public access. Much of the area to be included in the RNA extension is being managed for various resource uses. The boundary extension would not be appropriate for these reasons. The best way to protect the plant population is to fence the immediate area. This will be done in the summer of 1986.

12. Pine-Ramanote Canyon (Atascosa Mtns.) - We agree these areas need further evaluation and plan to do so with interested parties in the next planning period. Our initial evaluation is that these areas are not highly unique, are highly inaccessible and are not currently threatened by current or anticipated future use. In cases such as this, special

Agency response to Arizona Nature Conservancy (continued)

designation which calls attention to the area might be more of a threat to unique values because of increased public use. This phenomena has happened in several other special areas and increased activity threatens to destroy the values they were established to protect.

Designation is not the answer in all cases and the values of designation and nondesignation must be carefully weighed especially for areas that are remote, protected by physical barriers, or by other designations such as wilderness. We do not agree with your statement that the oak-pine community-type "is represented as a piecemeal inclusion within an existing RNA." The Pole Bridge RNA is proposed for expansion to better capture the communities for which it was established.

Ramsey Canyon - Although the Nature Conservancy has an excellent facility in the lower portion of Ramsey Canyon, we do not believe the National Forest lands above that merit special area designation, especially since that area is well protected by wilderness designation. Forest Plans are designed to recognize special values and consider them in the management area prescriptions. Special Designations should be reserved for special unique situations where Special Designation Status is the only means to provide for the values desired. Currently, the Special Area Designation enjoys a high degree of respect by all Forest users because it has been used wisely and frugally, Generally, both commodity and amenity user groups agree on the desirability of protecting unique values. We believe it is vital to maintain this respected reputation.

The opportunities for cooperative research and monitoring in the area will be available without RNA designation.

We are correcting the tables of the DEIS so that they will agree and to assure you that inconsistency does not reflect a lack of consideration for those areas for RNA designation. Rather it resulted from confusion when some areas were suggested for both RNA and ZBA designation. There is also a Pine Canyon suggested for Special Area designation in the Peloncillos as well as another Pine Canyon in the Atascosa Mountains.

In summary, the Coronado National Forest would appreciate working with the Nature Conservancy and others early in the next planning period to determine what management direction (RNA, ZBA, or other) is best for Pine-Ramanote and Ramsey Canyons.

0704

The Arizona Nature Conservancy

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FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 1 - 1985
RECEIVED

October 7, 1985

Mr. Robert Tippaconnic
Forest Supervisor
Coronado National Forest
301 W. Congress
Tucson, Arizona 85701

Dear Mr. Tippaconnic:

Thank you for providing us with a copy of the Draft Forest Plan. We are pleased to have the opportunity to comment on the Plan.

Our comments here are limited to the Redfield Allotment in the Safford District of the Coronado Forest. The allotment is located in the southern half of the Galiuro Mountains and is approximately 22,091 acres in size.

The Nature Conservancy acquired the grazing permit for the allotment in 1983 when the base property of the Muleshoe Ranch was purchased. This purchase was initiated in 1981 when the state of Arizona's Natural Heritage Program identified the Redfield Canyon area and watershed as "one of the most important sites for protection of aquatic and riparian habitats in the nearly 40,000 square miles of southern Arizona". This designation was based on the existence of several very specific habitat conditions and on the presence of a number of riparian-related threatened wildlife species delineated by the Arizona Game and Fish Commission.

This area's protectability, i.e. its existence as a complete and self-contained watershed, inspired The Nature Conservancy's substantial economic commitment toward its protection and management. It was selected as one of only 14 projects approved for inclusion in the National Critical Areas Program, a nation-wide project established to identify and lend funding support toward protection of large examples of America's rarest and most threatened ecosystems.

In the interval between acquisition and the present all we have learned about the Muleshoe Ranch, including the Redfield Allotment, has reinforced our initial designation of this property as worthy of both our past and current efforts and of our future involvement in its protection. Due to the reasons outlined below, relative to the special ecological and probable economic natures of the allotment, we respectfully request that the Coronado Forest seriously consider permanent retirement of the grazing permit and recognition of the Redfield Allotment/Watershed as a Zoological-Botanical Area under Special Interest Area (SIA) designation.

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The Arizona Nature Conservancy

30 North Tucson Blvd./Tucson, AZ 85716/(602) 327-4478 or 323-1857

October 7, 1985
Page Two

Biological considerations aside, there are a number of compelling factors suggesting retirement of the Redfield Allotment from grazing as a wise and prudent course of action.

The entire allotment is contained within the Galiuro Wilderness Area. A management plan for the Wilderness, written by the Forest Service in 1972, stated: "The majority of the Wilderness is so steep, rocky, and brushy that travel by foot and horseback is limited to cleared and graded trails....Wilderness activities in the Galiuro Mountains have increased only slightly in the past 10 years. Due to poor access [and] the difficulty of traveling within the wilderness....use should remain low during the next 10 years."

Both this poor access into the allotment and the difficulty of traveling within it are also serious obstacles to a viable cattle operation here.

While cattle have been on the allotment perhaps as recently as five years ago it has been somewhat longer than that that the allotment has actually been administered as a genuine cattle operation. The range improvements (water impoundments, rubble dams, pipelines, springs, stock tanks, cross-fences, etc.) have been neglected for years, perhaps as much as a decade or more. What neglect hasn't done, the 1983 floods and subsequent flooding has. Most of the improvements are virtually obliterated and all of them will have to be either extensively repaired or completely reconstructed from scratch.

The problem of the improvements is further complicated by changes in relative ease of access. Ease, of course, has never been the right word to use when discussing the Redfield Allotment but it is somewhat appropriate as access pre-flood was relatively easy compared to access problems now.

When the allotment was last utilized for grazing, roughly a decade ago, the operator was able to drive up the Redfield Canyon bottom as far as Hooker cabin. Many of the side canyons that contained developed springs were accessible by trails easily passable on horseback. Today, mainly due to flooding, the road to Hooker cabin is gone and horse access up Redfield and major side canyons is much more difficult. The destruction of what little access there was within the allotment has changed the job of improvement reconstruction from simply very difficult to one of extreme questionability. All materials would have to be brought in on horseback. There are enormous expenses involved in properly preparing the allotment for an efficient and responsible grazing operation, if indeed this is possible at all.

A second access-related difficulty is simply the 15-mile separation from the ranch headquarters and the allotment boundary at Jackson Cabin. Access into the allotment is possible only from the south. Cattle cannot reasonably be driven in from any closer access point than the ranch headquarters.

A third, and fairly formidible, access problem relates to the disjunct nature of the suitable grazing areas within the allotment. There are basically only two of them; the hillsides in the vicinity of Jackson Cabin in the lower portion of the allotment, and the area around the Cedar Flat/Cedar Spring site in the allotment's northern section. They are roughly 7 miles apart. In a responsible, well-supervised operation the cattle would be moved, as appropriate, between these two areas. Unfortunately, the large area between these two sites is very steep and rugged and, as a result, the cattle have always been trailed in the Redfield Canyon riparian bottom. This is the only feasible route. As mentioned above, this is now more difficult than in the past as the road and trail formerly used have been washed away by flood waters.

Coronado Forest range personnel have stated, because of the combination of ruggedness and difficulty of access, that the Redfield Allotment is the most difficult allotment on the Coronado to operate.

This difficulty, coupled with the enormous financial and labor investment necessary to repair and reconstruct range improvements, and the low carrying capacity, combine to define an operation that is less than marginal, in an economic sense.

The Nature Conservancy, in anticipation of the enormous capital start-up expenses in a cattle operation here, of the probability of sustaining annual operating deficits, and of satisfying the grazing mandate implied in holding the allotment permit, has been involved, for over a year, in discussions with the University of Arizona's College of Agriculture regarding a joint livestock venture on the Muleshoe Ranch. The University initiated these discussions and was initially quite enthusiastic about the possibilities. After thorough study, however, their analysis of the ranch's potential was that there was simply no way to maintain a profitable enterprise given the limitations of the allotment's extreme topography, the limited carrying capacity, very poor access, and high start-up costs. Their withdrawal is further confirmation of the extreme marginality of the Redfield Allotment's suitability for cattle grazing. A copy of their letter expressing their decision is attached.

Two other points need to be made here. The economic questionability of the allotment will be further affected, in a negative way, by the expected increase in public land grazing fees now under review. With the economic pressures increasing, even a responsible well-meaning operator would be faced with a situation in which the temptation to overgraze would be difficult to resist. This is partially borne out by the range analyses that have been done by U.S.F.S. personnel on this allotment in past years. Of 16 range inspections for which we have records, 11 of these indicate overuse and poor range condition.

The Redfield Allotment's topographic and economic unsuitability for sustained and viable cattle grazing is only one of two arguements in favor of retirement. The other arguement concerns the biological and scientific values of the Redfield watershed. The allotment boundaries follow the ridgelines that encircle a large interior valley in the Galiuro Mountains. As a result, these boundaries define the entire watershed of the Redfield Canyon drainage. Within these 22,000 acres there are no roads, only one small primitive cabin, very few trails, and, at present, very little public use and visitation. Aside from some historical small-scale mining activity and the effects of perhaps a century of cattle grazing the area is largely untouched. The allotment is relatively little known, to either recreationists and wilderness enthusiasts or to members of the scientific community.

Those, however, who are familiar with its canyons and upland areas realize that the Redfield watershed has very unique natural values. These values, along with the area's scenic beauty and its questionability for ranching, serve to suggest a "higher and better use" classification than that which it now enjoys. Many of these special values may indeed be threatened and impacted by the ranching activities associated with the allotment's use.

The Nature Conservancy would like to encourage the Forest Service to designate the Redfield Allotment/Watershed as a Zoological-Botanical Area in recognition of these natural values.

best copy available

Rationale for this designation is outlined below.

Botanical Values: The Redfield Allotment contains three plant communities of significant interest in the southwest. These three communities (the encinal or evergreen oak woodland, the juniper savanna ecosystem, and the mixed broadleaf ecosystem), in fact, represent three of the critical deficiences or gaps in the RNA network in Region 3 and, as such, are also of significant interest to the U.S. Forest Service.

In the southwest, south of the Mogollon Rim, woodlands often contain numerous species of evergreen oaks and other plants that occur as northern extensions of diverse Sierra Madrean flora. These extensions are one of the major reasons for the rich diversity of the Coronado Forest, making it perhaps the most biologically diverse forest in the country.

These woodlands are especially well represented on the Redfield Allotment by the Mexican Blue Oak-One-seed Juniper-Sideoats grama vegetation association (Type 8 on the enclosed vegetation map); and by the Mixed Oak-Squawbush-Blue Yucca Chaparral community (Type 9; chaparral is not a common vegetation type in southern Arizona and many of its species, such as Mexican blue oak, Mexican pinyon pine, and silverleaf oak are further representatives of the northern extensions of Sierra Madrean vegetation from the mountains of Mexico).

Vegetation Type 10, Alligator Juniper-One-seed Juniper-Beargrass savanna, as mentioned, is singled out as representative of a major gap in the Region's RNA network. Juniper savanna is an uncommon vegetation community in southern Arizona.

The Arizona Oak-Arizona Cypress woodland (Type 12) has very restricted distribution in Arizona and was singled out for special mention by the state of Arizona's Natural Heritage Program. The Arizona Cypress (Cupressus arizonica) is considered a relict species and is another representative of Sierra Madrean flora.

These woodland vegetation types provide 65% of the livestock grazing capacity in Region 3. It is, hence, difficult to locate minimally disturbed areas of these woodland types which are not commited to some degree of resource utilization. If the grazing permit is retired, the woodlands within the Redfield Allotment, because of their importance, diversity, excellent condition, and research/management interest are certainly worthy of Botanical Area designation.

The final, and perhaps most important, plant community for inclusion here is the mixed broadleaf riparian ecosystem found in the Redfield Canyon bottom and in major side canyons. The importance of this plant community in the southwest due to its diversity, its importance in contributing to the diversity of surrounding non-riparian communities, its productivity, its importance as wildlife habitat, and its increasing rarity is well known.

It would be difficult to find a mixed broadleaf ecosystem on Forest land in Region 3 that could surpass that in Redfield Canyon in size and diversity. The damage resulting from the 1983 flood is being mitigated by rapid regeneration of all major species, especially alder, sycamore, ash and walnut. In the canyon's upper elevations Arizona alder, southwestern chokecherry, maple and other more northern species dominate.

The Arizona alder riparian forest in Redfield Canyon has been designated as a rare plant community by the state of Arizona's Natural Heritage Program.

It is especially important to curtail cattle grazing in the bottoms of Redfield Canyon. Inclusion of this community in a specially designated Botanical Area will serve to focus attention on its importance in the future and further insure its ongoing protection.

Zoological Values: The allotment provides habitat for the following species of threatened and endangered wildlife:

Mammals	Group III,	Desert Bighorn Sheep
Birds	Group II,	Gray Hawk; Peregrine Falcon
	Group III,	Black Hawk; Zone-tailed Hawk; Northern Beardless Tyrannulet
Fish	Group III,	Gila Chub
Reptiles and Amphibians		Little is known about the presence of threatened reptiles and amphibians on the allotment due to a lack of adequate survey work. There are several expected candidate species.

Of the listed species all but the desert bighorn are closely tied to the riparian environment. The three hawks and the northern beardless tyrannulet are considered "obligate" riparian; the peregrine is considered a "preferential" riparian species. Management of the riparian habitat for wildlife can best be accomplished by the total exclusion of domestic livestock.

The desert bighorn can be found at higher elevations throughout the allotment. Its chances for continued survival and reproductive success are greatly enhanced if it is free of competition from domestic livestock.

Game Species: Coues' white-tailed deer populations could be expected to increase as climax communities resulting from livestock exclusion are attained. The reintroduction of the wild turkey in this range would have an increased chance of success as the diversity of climax communities are reached.

Other species of zoological interest include good populations of mountain lion; black bear are found throughout the allotment; confirmed presence of ocelot in nearby floodplain forests have been noted in recent years.

As referred to above, the major plant communities of the Redfield Allotment meet many of the criteria for inclusion in the Region's RNA network. The area's size, poor accessibility, and history of livestock grazing better qualify it, however, for SIA designation as a Zoological-Botanical Area.

The areas of major concern on the allotment are the relatively extensive riparian areas in the canyon bottoms. Livestock, like fish and wildlife, are primarily creatures of riparian habitat. Their exclusion from these areas is vitally important to maintaining the health of these wetland areas. A former Range and Wildlife Staff Officer for the Coronado Forest has written, "It has been our experience on the Coronado Forest that there is no known system of livestock management that will give adequate protection to a riparian zone. Even short-term or seasonal use is inadequate. Because these areas are usually extremely narrow and linear in character, grazing for only a few days can seriously impair their reproductive capability."

The importance of this riparian habitat to the T & E species listed above requires no further discussion.

October 7, 1985
Page Eight

FSM 2526.4 states: The condition, function, and productivity of riparian areas are related to physiographic and resource use factors in the tributary watershed.

Because the Redfield Allotment encompasses an entire watershed unparalleled opportunity exists to set aside a discrete and somewhat self-contained area from grazing that embodies unique plant communities and rare animal species. These natural values will greatly benefit from this exclusion. Recreation values for the wilderness enthusiast will increase. Administrative costs for the U.S.F.S. will decrease and the values for which the Galiuro Wilderness was originally established will be enhanced.

It is our feeling that retirement of the allotment grazing permit and establishment, in its place, of a Zoological-Botanical Area makes good sense, both economically and ecologically.

Sincerely,

Ken Wiley

Ken Wiley
Muleshoe Ranch Preserve Coordinator
The Nature Conservancy

The University of Arizona

College of Agriculture
Agricultural Experiment Station
Tucson, Arizona 85721
(602) 621-3859

1885
1985
A Proud Beginning

July 10, 1985

Mr. Dan Campbell
Nature Conservancy
30 N. Tucson Blvd.
Tucson, AZ 85716

Dear Dan:

As you know we have been considering with you for some time some type of joint venture regarding limited grazing on the Muleshoe Ranch.

The decision has now been made that the Muleshoe is not the venture for us at this time. I hasten to say that it has nothing to do with the interaction with the Nature Conservancy. In fact, that was a very strong positive feature of the ranch.

The real problem is with the carrying capacity, the extremely rough and almost inaccessible nature of the north half of the Ranch, and the amount of money that would be needed for putting the facilities in shape. We believe it would only be feasible to utilize the south half of the ranch given the items mentioned and the need to protect particular areas. However, even if the entire Ranch were utilized, it is our opinion that we would be fortunate to obtain a 300 cow permit. This figure is the absolute minimum that one could reasonably operate with.

Please understand we are committed to working in a multiple use arena and we'll do that wherever we finally are located. In the meantime we will still have to search and wait.

I believe there are members of the faculty who would like to be involved on the Muleshoe even if we are not involved in a joint venture on grazing. With your permission we will attempt to raise the consciousness of faculty about this opportunity.

I have discussed this with Dean Cardon and others and they concur this is the best decision. Please accept our most sincere thanks for your time and patience.

Sincerely,

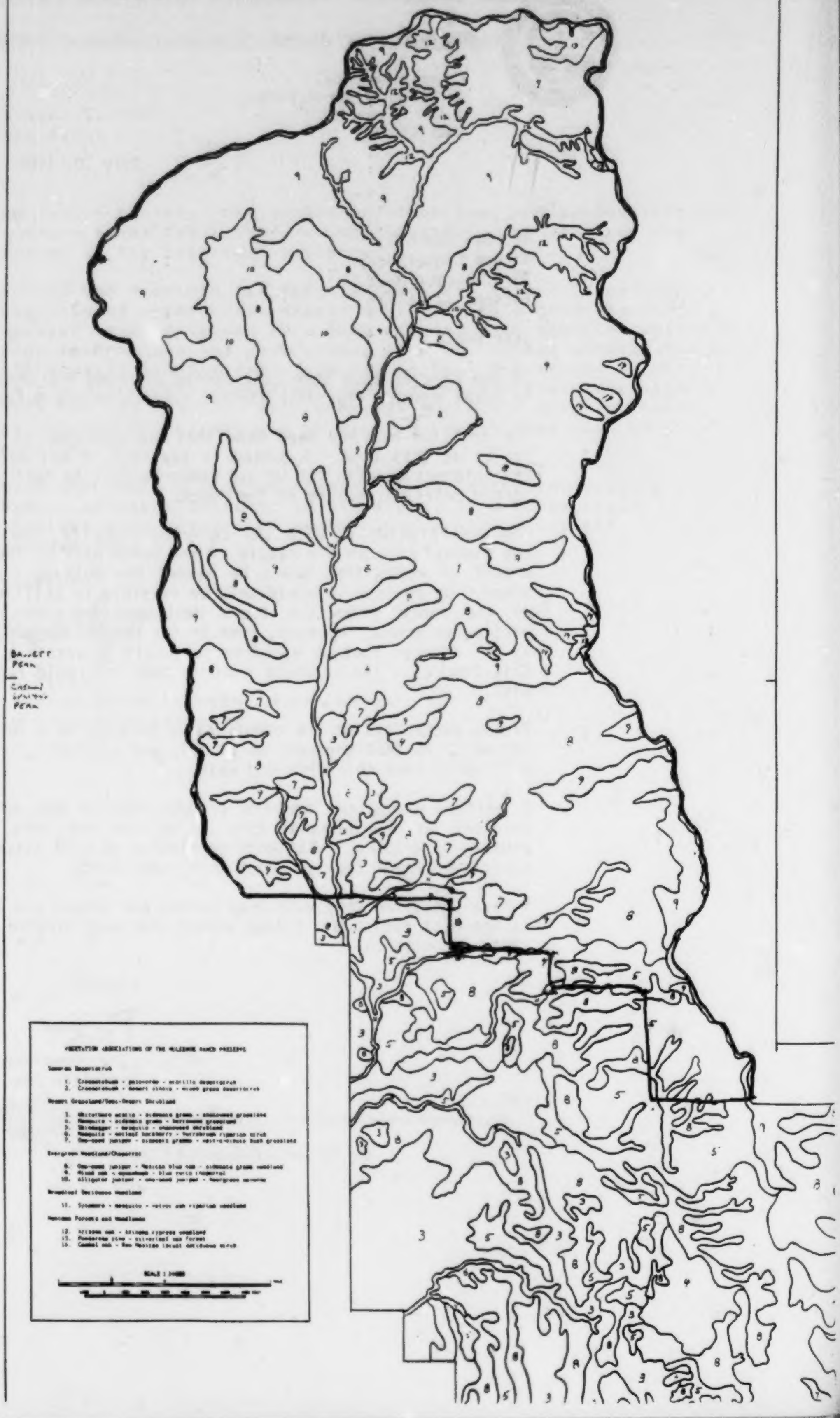
Pete

L. W. Dewhirst
Associate Dean and Director

LWD:aje

The Agricultural Research Organization of Arizona

VEGETATION OF THE MULESHOE RANCH PRESERVE



VEGETATION ASSOCIATIONS OF THE MULESHOE RANCH PRESERVE

Sonoran Desertscrub

1. Creosotebush - paloverde - ocotillo desertscrub
2. Creosotebush - desert zinnia - mixed grass desertscrub

Desert Grassland/Semi-Desert Shrubland

3. Whitethorn acacia - sideoats grama - snakeweed grassland
4. Mesquite - sideoats grama - burroweed grassland
5. Shindagger - mesquite - snakeweed shrubland
6. Mesquite - netleaf hackberry - burrobrush riparian scrub
7. One-seed juniper - sideoats grama - wait-a-minute bush grassland

Evergreen Woodland/Chaparral

8. One-seed juniper - Mexican blue oak - sideoats grama woodland
9. Mixed oak - squawbush - blue yucca chaparral
10. Alligator juniper - one-seed juniper - beargrass savanna

Broadleaf Deciduous Woodland

11. Sycamore - mesquite - velvet ash riparian woodland

Montane Forests and Woodlands

12. Arizona oak - Arizona cypress woodland
13. Ponderosa pine - silverleaf oak forest
14. Gambel oak - New Mexican locust deciduous scrub

SCALE 1:24000

Agency response to
Arizona Nature
Conservancy

Based on our analysis of the situation, we agree that a combination of economic and ecological factors makes it impractical to graze the Redfield Allotment, and this is reflected in the final Coronado Plan.

After careful consideration of your recommendation, it is concluded that most objectives of classifying the Redfield Canyon watershed as a Zoological/Botanical Area can be accomplished through application of management prescriptions for the Galiuro Wilderness. Your only concern not addressed by wilderness classification, is the need to close the area to grazing. Therefore, a zoological/botanical designation is inappropriate or unnecessary.

Due to the sensitive nature of the watershed, and its importance to your adjacent lands, a joint planning effort seems appropriate. We would appreciate your assistance in developing a plan for this area which integrates your objectives for the Muleshoe Preserve and the Multiple Use Goals of the Coronado. As grazing is phased out, most range improvements will not be needed, but more thought will be required to determine which improvements should be removed and which have value for resident wildlife. We look forward to working closely with you in this planning effort.

Arizona Outdoor Coalition
P.O. Box 31917
Tucson, Arizona 85751-1917

0059

August 10, 1985

R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic,

1 In response to your Coronado National Forest Proposed Plan, we would like to go on record opposing your idea that roads are "closed" unless posted "open". This policy is discriminitory, unfair, and a violation of our rights as taxpayers. It also creates administrative problems, at a time when budgets are already critical.

2 We would also like to go on record opposing any further wilderness. You have not provided detailed maps so we can determine what is contained in these wilderness study areas. We believe the criteria that the Forest Service has recently used to place lands into wilderness have ruined the original concept. These lands do not provide a true wilderness experience. Until the words of the 1964 act are upheld, "free from evidence of man," we will no longer support wilderness.

Alternative "B" is the best choice you have given us.

3 We also feel it is unfair that an obviously bias citizen group was able to publish their alternative in your books, and no one else was afforded the opportunity.

4 We agree that access to forest lands is a growing problem. The forest service should puchase rights-of-way to allow access, not only to trail heads, but to four wheel drive trails as well.

Sincerely,

James Cain

James Cain
President

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
[illegible] 1 [illegible] 1985
RECEIVED

Agency response to Arizona Outdoor Coalition

1. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads. Travel off these roads would not be allowed except by permit. Based on past conversations with members of four-wheel drive organizations, we believe most members agree with this concept at least in part.

   The Forest Plan makes no recommendations for closing any specific road to vehicular use. This means there would be over 2800 miles of roads within the Coronado National Forest open to motor vehicle use. Many of these existing roads are primitive, four-wheel drive type roads. Before any roads are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements.

   Signing or designation of roads open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is much work yet to be done to sign all roads. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off the road use of vehicles is not acceptable. Any direct enforcement of the policy will have to be implemented in stages along with the signing.

2. The criteria used by the Forest Service to determine what areas should be studied for wilderness suitability along with suitability for other resource uses are basically those contained in the 1964 Wilderness Act. During development of the 1984 Arizona Wilderness Bill, the Coronado National Forest provided input to the Congressional Delegations as did other groups and individuals. Our recommendations for wilderness or no wilderness are based on an analysis of resource tradeoffs in each area being considered. The recommendations also take into account desires of the using publics.

   The maps provided to the public along with the DEIS and Proposed Plan may not have contained the detail you needed to respond to the wilderness question for the three wilderness study areas. However, the information was available in additional planning documents.

3. We would welcome participation by your organization or others in the development of alternatives for managing the Coronado N.F. This participation could involve development of a total alternative or one component of an alternative such as management of off-road vehicles. The proponents of "Alternative D" came to us with their proposal. Although this concept is somewhat new, we feel it is another way to involve interested citizens.

4. The intent of the Forest Plan is to obtain necessary public access for all permanent roads and trails within the National Forest boundary. See page 29 of the Proposed Plan for a priority listing of needs. This includes primitive four-wheel drive type roads.

0091

Arizona Outdoor Coalition
P.O.Box 31917
Tucson, Az. 85751-1917

August 20, 1985

Mark Kaplan
Coronado National Forest
Federal Building
300 West Congress
Tucson, Az. 85701

Dear Mr. Kaplan;

1 I enjoyed your open house meeting at the Wilmot Library. It was nice meeting and visiting with you. I am looking for some information. I was told at this meeting that the Wilderness Act had been ammended. If possible I would like to get a copy of the 1964 Act and all revisions, including the dates that Congress enacted them. I am trying to find the criteria that the Forest Service used to prepare their recommendations to Congress for the 1984 Arizona Wilderness Bill.

2 At your open house we were given brochures, "Coronado National Forest, Islands in the Desert."It is a very nice brochure , it tells of backpacking, camping, picnicking, birdwatching, fishing, etc., etc. Our members who own four wheel drive vehicles would like to know why they are not considered a legitimate use of the forest?

3 We are interested in the astrophysical observatory on Mount Graham. Please put us on the list for any future mailings, EIS,etc.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 21 1985
RECEIVED

Sincerely;

Jim Cain
President
293-3786

Agency response to
Arizona Outdoor
Coalition

1. The 1964 Wilderness Act has not been amended. Other laws or acts have been been passed by Congress that have added additional areas to the Wilderness Preservation System established by the 1964 Act. The laws affecting Arizona are the 1978 Endangered American Wilderness Act, which established the Pusch Ridge Wilderness, and the 1984 Arizona Wilderness Act, which added five new areas and increased the size of two existing areas. Since these Acts are somewhat lengthy, you may wish to review them at a local library or at a local Forest Office.

   The basic criteria used by the Forest Service to determine what areas should be studied for wilderness suitability along with suitability for other resource uses are those definitions contained in the 1964 Wilderness Act as follows:

   > "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value."

   During development of the 1984 Arizona Wilderness Bill, the Coronado National Forest provided input to the Congressional Delegations as did other groups and individuals. Our recommendations for wilderness or no wilderness were based on an analysis of resource tradeoffs in each area being considered. The recommendations also took into account desires of the using publics.

2. The Coronado National Forest does consider four wheel drive vehicles a legitimate use of the Forest. The activity listing in the brochure was not intended to be all inclusive. It should be noted that all the activities listed are dependent to some degree on the use of motor vehicles.

3. We look forward to any comments you may have once the Mt. Graham draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document.

Arizona Outdoor Coalition
P.O.Box 31917
Tucson, Az. 85751-1917

0711

R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress St.
Tucson, Az. 85701

CORONADO N. F.
OCT 11 '85

Action X		Action X		Action X		Action X	
Info ✓	Init	Info ✓	Init	Info ✓	Init	Info ✓	Init
FS		RCS		LA		D	
LMP		S&F		ATCH		N	
AO		PER		WL		SV	
ENGR		AS		WS		S	
RGE		CS		SLS		SC	
RLT		LX		DISP		NARTC	
FIRE		RECP		PIO/IS		COMM	

Dear Mr. Tippeconnic;

We have studied your proposed plan for the Coronado National Forest. We would like to support our earlier letter in favor of Alternative B. You leave us no choice! Your policy that roads are closed unless posted open is against tax payers rights. As long as you follow this concept, we cannot support any further closed or restricted areas in the forest.

Alternative B is the only acceptable choice.

Sincerely;

Jim Cain

Jim Cain
President

Agency response to Arizona Outdoor Coalition

Please refer to our response to your letter dated August 10, 1985.

Arizona 0698
State Land Department

BRUCE BABBITT
GOVERNOR

1624 WEST ADAMS
PHOENIX, ARIZONA 85007

R. K. LANE
STATE LAND COMMISSIONER

CORONADO N. F.
OCT 10 '85

Action X Info ✓ Init	Action X Info ✓ Init	Action X Info ✓ Init	Action X Info ✓ Init
__ FS __	__ RES __	__ LA __	__ B __
__ LMP __	__ B&F __	__ ARCH __	__ R __
__ AO __	__ PER __	__ WL __	__ SV __
__ ENGR __	__ AS __	__ WS __	__ S __
__ RBE __	__ CS __	__ SLS __	__ SC __
__ RLT __	__ LX __	__ DISP __	__ NARTC __
__ FIRE __	__ RECP __	__ PIO/IS __	__ COMM __
__ __	__ __	__ __	__ __

October 4, 1985

Mr. Robert B. Tippeconnic
Forest Supervisor
Coronado National Forest
Federal Building
300 West Congress
Tucson, AZ 85701

Re: Draft EIS Proposed Coronado National Forest Plan

Dear Mr. Tippeconnic:

The Arizona State Land Department appreciates the opportunity to comment on the Proposed Coronado National Forest Plan. As the predominant adjoining land management agency to all Ranger Districts on the Coronado National Forest we are impacted by Forest Service management practices.

Not all of the Issues, Concerns, and Opportunities (ICO's) identified in the plan related to or impact upon state trust lands. The Land Department will address those which impact us because of your management decisions and practices.

RANGE: The Land Department's best opportunity to interface with your range staff occurs at yearly Interagency Coordinated Planning meetings. At these sessions personnel from our Department, your Forest, Soil Conservation Service, and Bureau of Land Management prioritize ranches slated for initial contacts, management plan development, or followup monitoring. Our range staff finds the Forest Service has usually prepared a separate plan for the forest allotment on the ranches discussed. The State, BLM, and private lands must then be addressed in another separate plan. This "I develop my plan and you develop yours" kind of thinking defeats the true intent of coordinated planning. The Coronado National Forest needs to be more involved with developing grazing management plans for entire ranch units and incorporating forest lands into grazing schedules with State, BLM, and private lands.

1

The Forest's unwillingness to become involved in truly coordinated plans on entire ranch units may be due to the season of use restrictions associated with some forest allotments. Fall-winter use on the forest forces spring-summer use on the lower elevation state lands. The warm season vegetation species which make their predominant growth at this time of the year are grazed at the time when they are most vulnerable to damage. Ranches which have enough pastures to alternate use on the non-forest land from year to year may not be adversely affecting warm season species. Those that do not are used at the same critical growth time every year. This practice is not proper range management. Yet this is what occurs due to restrictive Forest season of use policy.

I suggest the Coronado National Forest change from a fall-winter season of use where it now occurs. Spring-summer use should be allowed on the forest provided it is recommended in a coordinated management plan between the Forest Service and the appropriate off-forest management entity. Grazing management systems can be developed which allow sufficient use and rest periods of forest and non-forest lands to improve vegetative conditions on the entire ranch unit.

1 The Coronado National Forest should not develop its long term range management plan in a vacuum. With ecosystem management the popular trend today the Forest Service should not be thinking strictly in terms of forest allotments. The State, BLM, and private associated with most ranches need to be considered as well. To upgrade range condition on entire ranch units management plans cannot be developed for forest lands alone.

2 FUELWOOD: State trust lands will be subject to unauthorized woodcutting depending upon how well the Coronado National Forest meets public demand for fuelwood. I suggest you explore the development of the commercial fuelwood market you suggest by utilizing wood fiber from coniferous forest lands that might not be utilized by conventional sawmills. This may help satisfy the public demand for fuelwood.

3 FIRE MANAGEMENT: The plan's proposed action and all alternatives state wildfires will be suppressed as needed to protect life and property. Changes from the current situation are planned to do two things: 1) reduce suppression costs, and 2) increase burned acreage. Since the Land Department has a 48 hour control policy for our wildfires it may be necessary for you to divert from your proposed action for fires burning close to the forest boundary. If you allow fires to burn off forest by following the proposed action the Land Department will be required to mobilize its forces to suppress the fires in order to achieve control within our 48 hour limit. I suggest the Coronado National Forest direct its wildfire suppression as needed to protect life, property, and adjoining state land.

Sincerely,

Robert K. Lane
State Land Commissioner

RKL/SMW/cn

Agency response to
Arizona State Land
Department

1. Annual Interagency Coordinated Planning Meetings between Arizona State Land Department (ASLD), Bureau of Land Management (BLM), Soil Conservation Service (SCS), and the Coronado National Forest have proven quite useful in integrating the management of adjacent and intermingled lands in Southern Arizona. We appreciate your cooperation in this effort. We believe in integrated planning and constantly advise Forest Service grazing permittees to explore this option. Differences in perspectives and priorities cause certain difficulties in scheduling allotments for planning. For example, your range conservationists have recently placed a priority on analyzing and planning for ranches with intermingled State and BLM lands. This has been accelerated by your recent efforts to exchange lands with the BLM. Although we applaud both of these efforts, it makes it difficult for us to integrate our planning efforts.

   Conflicts in priorities are inevitable. We appreciate the spirit of cooperation of all personnel of the Arizona State Land Department.

   The Forest is aggressively pursuing satisfactory range conditions over the entire Coronado. Since we have historically been better funded and staffed than you, resulting in us getting ahead on the planning job and often completing a plan for a given allotment before you are ready to start. This does not reflect any lack of commitment to integrated planning on our part, but merely scheduling conflicts.

   No season of use restrictions exist, nor are any planned for the Coronado. Our range conservationists are allowed to plan grazing at any season that is beneficial to the natural resources. The nature of the terrain and vegetation often makes our lower mountain ranges particularly suitable for winter range, and many National Forest grazing permittees prefer to use the Forest in the winter season and graze adjacent State and BLM lands in the summer. This helps to prevent problems with predation on young calves and harassment of cattle by flies, which occurs on mountain pastures in the spring and summer. It also requires very close monitoring to insure that forage competition with deer does not develop.

   Your agency has made great strides in range management in recent years and we have developed a great respect for your range conservationists. However, a past history of more custodial management, coupled with your more economically oriented objectives, results in problems of coordinating the actual numbers of livestock that can be permitted based on other resource objectives. Also many of our permittees are quite reluctant to enter into overall ranch plans, because of a fear that the more restrictive Forest Service regulations will spread to the "outside lands." Another problem arises from the fact that winter ranges on the Forest are stocked at a rate consistent with growing season deferment every year. In most cases any conversion to growing season or yearlong use would require a decrease in animal numbers.

   Anytime the State Land Department proposes integrated planning that encompasses sound principles of range management, including proper stocking rate, we will be happy to cooperate. If this involves allotments with currently approved AMPs, we will modify them as needed. When such proposals are rejected by the involved permittees, we must continue to plan for proper management of the National Forest.

   Your concerns will be discussed with Coronado range managers and encourage them to consider your needs.

2. As stated, the Coronado National Forest will be unable to meet total local public demand for oak and mesquite fuelwood species. We will explore the possibility of developing a market for the available wood fiber on coniferous forest lands. Other Forests are also assessing similar fuelwood issues. Some Forests are also unable to meet fuelwood demand. The fuelwood issue involves all landownerships in Arizona; private, County, State and federal, and the State Land Department can help us all on this.

Agency response to
Arizona State Land
Department
(continued)

3. The fire management policy in the Forest Plan allows us to take appropriate actions to protect life, property, and confine fires to National Forest land. We have no intent of deliberately allowing fires to burn on to State land without prior agreement. The formation of Interagency fire teams as begun in 1985 should help insure consistent application of fire management policies of all concerned agencies.

ARIZONA
STATE
PARKS

1688 WEST ADAMS STREET
PHOENIX, ARIZONA 85007
TELEPHONE 602-255-4174

BRUCE BABBITT
GOVERNOR

STATE PARKS BOARD MEMBERS

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FLAGSTAFF

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STATE LAND COMMISSIONER

MICHAEL A. RAMNES
DIRECTOR

ROLAND H. SHARER
DEPUTY DIRECTOR

0638

CORONADO N. F.

OCT 11 '85

Action X		Action X		Action X		Action X	
Info ✓	Init	Info ✓	Init	Info ✓	Init	Info ✓	Init
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__ LMP	____	__ P&F	____	__ ARCH	____	__ N	____
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October 10, 1985

R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, AZ 85701

Dear Mr. Tippeconnic:

The Natural Areas Advisory Council (NAAC), a ten-member advisory group of resource professionals serving the Arizona State Parks Board, offers the following comments concerning the draft Environmental Impact Statement and Proposed Coronado National Forest Plan.

In the fall of 1984, the NAAC visited several existing and proposed research natural areas (RNA) located on the Coronado National Forest. The NAAC urges the U.S. Forest Service to consider the following comments:

1 **Canelo** - The 350 acre proposed RNA is an excellent example of an oak-woodland community with a well-developed herbaceous understory. The diversity and excellent condition of the native perennial grass species are impressive. Canelo meets the RNA criteria and is worthy of designation.

2 **Lochiel** - the proposed plan stated that Lochiel and Elgin RNA represent the same grassland type; the NAAC disagrees. Elgin is not comparable to Lochiel and should not be considered as an adequate substitute. The Lochiel site is a superior example of a plains grassland community in that it features a higher diversity of native perennial grasses and is less disturbed. The drainages of the two sites are different; Lochiel is wide and diverse while Elgin is narrow and supports a woodier growth of plants. Recent use of the Elgin area by livestock is apparent. The local abundance of Heterotheca and Conyza in the washes and the presence of Salsola, Isocoma tennisecta and Eragrostis Lehmanniana are all indications of past distrubance. Now that the Elgin site is fenced to exclude grazing, its research potential is considerably improved. The dynamic nature of the Elgin site and the opportunity to document the recovery potential of a previously grazed site make it a valuable site. Lochiel represents a purer stand of grasses than the Elgin site and is worthy of separate designation, either as a RNA or as a Botanical Area.

Sunnyside Canyon - after visiting the site, the NAAC agreed that the site has undergone drastic disturbance and vegetative manipulations and does not meet RNA standards. The NAAC has removed the site from further State Natural Area Program consideration.

CONSERVING AND MANAGING ARIZONA'S HISTORIC PLACES, HISTORIC SITES, AND RECREATIONAL, SCENIC AND NATURAL AREAS

3 **Scotia Canyon** - The NAAC was unable to visit the USFS recommended "replacement", Pole Bridge Canyon, so cannot comment on the suitability of the latter area. It should be noted that Scotia Canyon supports several sensitive species, notably Euphorbia plummerae, Asclepias lemmonii and Empidonax fulvifrons pygamaeus. The NAAC recommends special designation of the area either as an RNA or Zoological/Botanical area.

Sycamore Canyon addition - this area will be an important addition to the RNA System. The flora of Sycamore Canyon is of considerable significance due to the diversity of species found here, including several Mexican species that only extend into the U.S. in this area. Sycamore Canyon also features unique floristic elements such as Dalea tentaculoides and Choisya mollis that are being considered for listing under the Endangered Species Act of 1973, as amended. The NAAC fully supports the USFS proposal to expand the Goodding RNA to include Sycamore Canyon.

4 **Mt. Graham** - The 40-acre wetland site supports a wet meadow plant community, a vegetation type that is rare in Arizona. Inclusion of this site in the RNA system is an appropriate action that would facilitate the conservation of this significant botanical resource.

Upper Guadalupe - The NAAC supports the designation of this area as a Zoological Area.

5 **South Fork of Cave Creek** - The NAAC supports the designation of this area as a Zoological-Botanical area. This area has been of long-standing interest and concern to the NAAC and the NAAC recommends the entire proposed 12,420 acres be designated along with the 14,720 acres comprising Main Cave Creek.

6 **Pine-Ramonote Canyon** (Atascosa Mountains) and the upper reaches of **Ramsey Canyon** should be considered as Zoological-Botanical areas. The sites possess rare flora and fauna and are worthy of special management.

The NAAC would also like to offer the following recommendations as possible geologic areas for the Coronado National Forest.

7 **Santa Catalina Mountains** - 1) Reef of Rocks - youngest intrusive mass in the range. 2) Marshall Gulch - unique layered intrusion near the picnic area.

Whetstone Mountains - French Joe Canyon from the bottom near French Joe Spring to the top of French Joe Peak. Excellent section of Paleozoic rocks, unsurpassed in southern Arizona.

Dragoon Mountains - North end of Cochise Stronghold - excellent example of granitic intrusion into older country rock.

Galiuro Mountains - west flank of Bassett Peak, from Redfield Canyon to top of Bassett Peak. Excellent example of thick sequence of mid-Tertiary volcanic rocks.

7 **Chiricahua Mountains** - Onion Saddle area, down both sides of the mountain along the main road, showing mid-Tertiary volcanic depositional upon older strata of Cretaceous age.

The Proposed plan went in to some depth regarding the proposed astrophysical site on Mt. Graham. The NAAC offers the following comments concerning the significance of the proposed site's natural values:

- o The site includes a unique, high-altitude stand of spruce-fir forest; the 700 acres comprise the southern most stand of spruce-fir in the U.S.
- o There are four endemic rodents inhabiting the area; spruce squirrel, vole, shrew and a pocket gopher.
- o Two Sonorella snails exist on the northeast slopes of Mt. Graham.
- 8 o The area includes the headwaters of four springs and cienegas, with reintroduced Apache trout in the upper reaches of two creeks. The cienegas fall under Executive Order protecting wetlands.
- o Occuring near the very top of the Grahams are several unstudied unique southern Arizona glacial and paraglacial features.
- o There are nearly a dozen insect species found in the area that are undescribed in literature.
- o Mt. Graham provides critical springtime habitat for the area's black bear population.
- o The area provides important habitat for two sensitive species; northern goshawk and spotted owl.
- 9 o There is a proposed Mt. Graham Wilderness Area currently under study. The proposed astrophysical site would significantly reduce the wilderness acreage.

Because of the large amount of significant natural values existing on Mt. Graham and the uniqueness of many of those features, the NAAC recommends the most stringent measures be taken to mitigate the impacts of any proposed development for the area.

The NAAC is particularly interested in the USFS management of wetlands and riparian
areas within the Coronado National Forest. Riparian habitat is fast disappearing in the
arid Southwest. The amount of riparian lands in existence in Arizona 100 years, even 50
years ago, was far greater than the pitifully small acreages that are present today.
Although riparian areas occupy minimal acreage within the State, they still continue to
support the vast majority of wildlife species and represent important habitats critical to
the survival of many federal and State listed species. The NAAC recommends that
10 greater protective measures, including fencing to exclude livestock grazing, be adopted
to ensure the healthy continuance of wetlands and restoration of previously degraded
riparian areas.

11 Special management areas such as research natural areas, botanical, zoological and geological areas occupy miniscule acreages when considered on a regional USFS basis. The NAAC strongly encourages the Coronado National Forest to place a greater priority on the overall values of designated special management areas. These areas involve relatively small acreages and include only small parcels of economically valuable resources. RNAs, ZBAs, etc, serve to preserve examples of our natural heritage that, often time, are found nowhere else. Conserving 40 acres of virgin spruce-fir forest or 10 acres of a wetland meadow should rank higher than the current policy of emphasizing commodity production. The NAAC recommends a more balanced perspective between economic and preservation issues.

Thank you for this opportunity to comment on the Coronado National Forest Service Proposed Plan and DEIS. If you have any questions, please don't hesitate to call.

Sincerely,

Tanna T. Baldwin

Tanna T. Baldwin
Natural Areas Coordinator

Agency response to
Arizona State Parks
Natural Areas
Advisory Council

1. The Forest Plan does recommend designating the 350 acre Canelo area as a research natural area (RNA). (Proposed Plan page 76).

2. We agree that there are differences between the Elgin and Lochiel areas. However, we must point out that it is Elgin that has gone ungrazed for more than a dozen years, while Lochiel is grazed annually. Lochiel does not qualify for RNA status because of the continuing use by domestic livestock. The fact that this area has desirable qualities sought for representation reflects credit upon the quality of management by the permittee. RNA designation with the required end to grazing is an inappropriate reward for good management.

   Perhaps a small portion could be suitable for co-designation as a State Natural Area and a National Forest Botanical Area. This designation would need to provide for continued use by the livestock permittee in a manner compatible with the Botanical Area objectives. We propose to explore this further with interested parties during the next planning period.

3. Review of this area indicates that it does not measure up to the quality standards for designation as an RNA or Botanical Area. We believe the sensitive species indicated are adequately or better represented elsewhere on the Forest. We are aware of the concern for sensitive plants and believe that the management prescription in the Plan will continue to maintain the populations indicated in Scotia Canyon. Additional RNA's in the Chiricahua National Monument provide additional redundancy.

4. The desirability of establishing an RNA or ZBA (wet meadow and/or spruce fir) within the proposed astrophysical development area will be addressed in the EIS now being prepared to evaluate the observatory proposal.

5. We believe that the combination of the proposed Zoological-Botanical Area and expanded Chiricahua Wilderness provide adequate representation and protection for the values of South Fork of Cave Creek. We are sensitive to the high values associated with the Main Fork of Cave Creek and the management proposed in the Coronado Plan (Management Area 3) will provide the needed emphasis.

6. We agree the Pine-Ramanote Canyon (Atascosa Mountains) areas need further evaluation and plan to do so with interested parties in the next planning period. Our initial evaluation is that these areas are not highly unique, are highly inaccessible and are not currently threatened by current or anticipated future use. In cases such as this, special designation which calls attention to the area might be more of a threat to unique values because of increased public use. This phenomena has happened in several other special areas and increased activity threatens to destroy the values they were established to protect. Designation is not the answer in all cases and the values of designation and nondesignation must be carefully weighed especially for areas that are remote, protected by physical barriers, or by other designations such as wilderness.

   Although the Nature Conservancy has an excellent facility in the lower portion of Ramsey Canyon, we do not believe the National Forest lands above that merit special area designation, especially since that area is well protected by wilderness designation.

7. Geologic Area designation would have no effect on activities within the forest and we see no advantage to classification of areas well-known in the geologic community, but of minimal interest to the general public.

8. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at

Agency response to
Arizona State Parks
Natural Areas
Advisory Council
(continued)

least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

9. The Forest Plan was changed to recommend wilderness designation for the entire 62,000 acre Mt. Graham Wilderness Study Area. Our current analysis indicates there are no conflicts between this wilderness allocation and future management of the proposed Astrophysical Area whether it be development or no development.

10. We certainly agree that riparian areas need special management considerations, because they are sensitive to grazing and other land uses. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing, and have included criteria in the Plan to identify these areas.

11. While we agree with an affirmative program in Special Area identification and management; we do not believe that designation of many small areas in the 10 to 40 acre range is practical or meets the intent of Multiple Use management. Forest Plans are designed to recognize special values and consider them in the management area prescriptions. Special Designations should be reserved for special unique situations where Special Designation Status is the only means to provide for the values desired.

Currently, the Special Area designation enjoys a high degree of respect by all Forest Users because it has been used wisely and frugally. Generally, both commodity and amenity user groups agree on the desirability of protecting unique values. We believe it is vital to maintain this respected reputation.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

AUG 15 1985

RECEIVED

ARIZONA STATE PARKS

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PHOENIX, ARIZONA 85007
TELEPHONE 602-255-4174

BRUCE BABBITT
GOVERNOR

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ROBERT K. LANE
STATE LAND COMMISSIONER

MICHAEL A. RAMNES
DIRECTOR

ROLAND H. SHARER
DEPUTY DIRECTOR

August 14, 1985

0074

Mr. R. B. Tippeconni
Forest Supervisor
Coronado National Forest
300 W. Congress Street
Tucson, AZ 85701

Re: Coronado National Forest
Proposed Plan and Draft
Environmental Impact
Statement

Dear Mr. Tippeconnic:

Thank you for providing this office with copies of the above referenced documents for review. We would like to commend the Forest Service for the thorough and thoughtful consideration given to cultural resources in these documents.

We have reviewed the proposed Plan and Draft Environmental Impact Statement and, while we support the Coronado Forest's proposed action in concept, we do have the following comments.

Proposed Coronado Forest Plan

Chapter 2. Issues, Concerns, and Management Opportunities (p.6)

We are concerned that the only issue regarding cultural resources was "the amount of time and investment to interpretation of cultural resources".

We believe there are other cultural resource issues and concerns of higher priority that the Coronado Forest should consider and present in this plan. These issues include:

a. Completion of a forestwide inventory and evaluation of cultural resources

b. National Register nomination of significant cultural resources located on the Coronado Forest

c. Protection and appropriate treatment of significant cultural resources on the Coronado Forest (this includes public interpretation of resources)

Chapter 3. Summary of the Analysis of the Management Situation (pp. 11 and 12)

We believe that the cultural resource legislation discussed in this section includes the protection of resources as well as the "inventory, evaluation, and interpretation". We suggest you include "protection" with the other aspects of cultural resource management referenced in this section.

A list of properties located on the Coronado Forest that are listed in the National Register is included in this section. The site of Yaqui Springs is included in this list. After consulting with the National Register, we have determined that Yaqui Springs is listed on the National Register as a component of the Coronado National Monument as opposed to being listed individually on the Register. Therefore, we recommend that the text in the Forest Plan document be revised to clarify the National Register status of this property and put an end to any confusion regarding its listing.

Finally, though we encourage the Forest Service to provide for the protection of Fort Rucker, we strongly encourage the nomination of this property to the National Register. Theoretically, since Fort Rucker is not currently listed, its "significance" is in question. With this concern in mind, the justification for expending funds for protecting this resource rather than funding activities on "significant" resources (properties currently listed on the National Register) is unclear. We urge you to include information as to why Fort Rucker was selected to receive protection funds and a statement that the Forest Service will prioritize this property's nomination to the National Register.

Chapter 4. Management Direction

We suggest that the Goals concerning cultural resources, as identified under Recreation (A), be revised to include the following language:

> Identification, Evaluation, Nomination to the National Register, Protection and Management of historic and cultural resources.

Under the cultural resource portion of the Management Presecription Applicable to All Areas of Forest (p. 41), we have comments on and/or recommend the following rewording of Items #1,2,5,8,13, and 14.

1. Conduct cultural resource inventories for proposed ground disturbing activities; prepare a report including a National Register evaluation of the resource and avoidance or mitigative measures ...

2. The Forest will comply with the National Historic Preservation Act, as amended, (NHPA).

5. All identified sites ...

   ... Nominations to the Register will be coordinated with the SHPO. Priorities for nomination will be determined ...

8. What is the rationale for allowing this significant resource to deteriorate rather than stabilizing it?

13. and 14. The archaeological sites in Sabino Canyon and Fort Rucker should both be listed on the National Register. We urge you to include language to that effect in these references.

Chapter 6. Monitoring Plan

We recommend an addition to the cultural resource items listed in this chapter for monitoring. This item should focus on the completion of a forestwide cultural resource inventory, evaluation, and nomination of properties to the National Register. The purpose of this item would, of course, be what the Forest Service is mandated to accomplish in the National Historic Preservation Act, as amended, and E.O. 11593.

Draft Environmental Impact Statement (DEIS)

As the companion document to the Proposed Coronado National Forest Plan, the comments we have made regarding the Plan are applicable to the DEIS as well.

We hope these comments will be of assistance to the Coronado Forest in further developing and refining this important Planning document. Please feel free to contact Sarah Eichinger of my staff if you have any questions.

Sincerely,

Donna J Schober

Donna J. Schober
State Historic Preservation Officer

DJS:mes

Agency response to Arizona State Parks State Historic Preservation Officer

Standards and guidelines for management of cultural resources will be revised to assure consistency with the requirements contained in the settlement agreement entered as final judgement in the Region 3 cultural resources lawsuit (Save the Jemez, et al., vs. Block, et al.; State of New Mexico vs. Block and Peterson). This agreement contains minimum standards for the following: design and execution of on-the-ground inventories; training and supervision of personnel conducting cultural resource management work; marking, protection and inspection of identified cultural resources during undertakings; damage assessment procedures and prosecution of damage claims; nomination of cultural resources to the National Register of Historic Places; inspection of National Register and other properties; site stabilization and repair; recording and data recovery for sites to be affected or destroyed; protection of cultural resources from vandals; management and conduct of undertakings; treatment of sites discovered during undertakings; and data sharing with State Historic Preservation Officers.

The settlement agreement also requires that within 18 months following October 1, 1986, Region 3 Forests will review and further a[redacted] the cultural resource elements provided for in Forest Planning (36 CFR 219.24). The level of detail to be included in this effort will be defined in Regional guidelines developed in consultation with appropriate State Historic Preservation Officers. The final Forest Plan will specifically provide for the expansion of these cultural resource elements in accordance with the terms of the settlement agreement.

The Powers Cabin is located in a relatively inaccessible area regardless of the recent wilderness designation. This makes stabilization and maintenance efforts quite difficult. Because the area is now within the Galiuro Wilderness, impacts to the site should be minimal. The site's setting is being maintained and there is sufficient documentation (written and photographic) so that a permanent record of the site exists.

Camp Rucker is now being nominated to the National Register of Historic Places.

The Sabino Canyon Prehistoric use area will be inventoried as a first step in evaluation and nomination to the National Register.

Appropriate wording has been provided in the Final Coronado Forest Plan.

NORTHWEST CANCER CENTER
ONCOLOGY • HEMATOLOGY
1560 NORTH 115TH STREET, SUITE G16
SEATTLE, WASHINGTON 98133
(206) 365-8252

CHARLES M. BAGLEY, JR., M.D.
ROBERT F. LANE, M.D.

0071

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 16 1985
RECEIVED

August 8, 1985

Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Re: Draft EIS for Coronado National Forest Proposed Plan

Dear Sir:

1 I received in the mail a summary of this draft EIS, which I have reviewed. The summary states that the full EIS can be seen at local forest service offices in Southern Arizona. These full draft EIS documents are not being mailed to people in distant areas who may want to comment; only the summary is available, as I have received. Thus, since U.S. citizens living at some distance from Southern Arizona are effectively eliminated from being able to practically review the full draft EIS, I feel that preservation of their civil rights includes that their letters, based only on the summary of the draft EIS, should be given equal weight as those who have actually reviewed the full draft EIS.

2 The summary draft EIS contains certain distortions in my opinion. Number one is that wilderness preservation is not given adequate weighting. Since wilderness lands can be permanently removed from wilderness status by mineral or forest or other developmental exploitation, alternatives which preserve larger amounts of wilderness should be given special enhanced weighting because they preserve the option of either wilderness or future exploitation. On the other hand, those programs which call for less wilderness will not allow the future consideration of wilderness at a later time and, therefore, should receive less weighting since they allow fewer future options.

3 Alternative D, which allows little or no development on Mt. Graham, is apparently criticized in the summary on the basis that astrophysical developments on Mt. Graham are proposed. In fact, two full pages of the summary are devoted to a discussion of the "Mt. Graham astrophysical proposal." However, the summary fails to make any statement as to who or when such proposals are formulated and what the funding will be. With the current reduction

3 in funding for various scientific projects on a national level, it seems likely that such an astrophysical site may not be developed for years or, in fact, never developed at all. Thus, to place a very substantial amount of evaluation on the potential for such an astrophysical site seems quite unrealistic. The amount of weight placed on this variable should be reduced or eliminated completely.

4 The outline of the various alternatives, including the preferred alternatives, as stated on page 7, makes the blanket and undocumented assertion that for most alternatives "costs are unconstrained." However, page 10, which outlines the cost to the Forest Service, shows that there is a great variation in the Forest Service budget necessary for the different alternatives, with alternatives B and C being vastly more expensive than the others. A fair summary of the alternatives should point out the increased expense of those. Furthermore, the preferred alternative, which is "charted according to anticipated budgets" is, in fact, not the least expensive one, and this should be noted.

5 Finally, the summary draft EIS actually makes no claim or rationale as to why the preferred alternative is, in fact, "preferred." There is no argument, analysis or reasoning given f.s. ~~behind~~ this preference. This must be spelled out in detail in order to be considered acceptable.

Thank you for allowing me to make these comments.

Best wishes,

Charles Bagley

Charles M. Bagley, Jr., M.D.

210/7

Agency response to
Charles M.
Bagley, Jr., M.D.

1. You were mailed a copy of the full Draft EIS and Proposed Plan on August 20 which we hope your received. All substantive comments receive equal consideration regardless of the document upon which they are based or the location of the commentor.

2. We disagree. Under the various laws affecting management of the National Forests, all resources must be given equal consideration. "Developmental" alternatives do not necessarily reduce future options anymore than "wilderness" alternatives.

3. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

4. The statement "costs are unconstrained" refers to the fact that those alternatives were not developed within a given budget constraint as were the Preferred Alternative (PA) and Alternative A (current). The purpose of the table on page 10 of the Summary was to highlight major differences between alternatives, including costs as you have noted.

5. The purpose of an EIS is to display alternatives and disclose environmental effects in a comparative format. It is up to each individual to determine which alternative is "preferred" based on their criteria. The Record of Decision which accompanies a final EIS discloses the rationale used by an agency in selecting a final alternative.

   All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

AUG 30 1985

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0207

3231 E LESTER ST
TUCSON AZ 85716

28 AUG 1985

Forest Supervisor
Coronado National Forest
Tucson AZ

Subject: Summary of the Draft Environmental Impact Statement for the Coronado National Forest Proposed Plan

1 Alternative D is my choice, with reservations.
Specific suggestions:

2 page 6 - We already have too many roads and trails. Do not use road building to look busy

3 page 11 - Wood harvesting could use horses or 4WD on temporary trails which should be repaired to restore as natural a condition as possible. If harvesters build roads or leave ruts, recall their permit. The public (Boy Scouts, Hiking Club etc) should not have to repair damage. I volunteered to clean up after FWS left a mess at Rose Canyon Lake. Next time I'll sue! If harvesters and miners had to restore the environment, it would create jobs for local people.

4 page 12 - Off road exemptions may be needed for ranching and wood cutting with provision not to destroy the environment or abuse their privilege

5 page 14 - Astronomers need to be more sensitive to environmental rape that they were at Mt. Hopkins. Senseless dumping made unnecessary eye-sores. Learn how to build without destroying the scenery. The Swiss are very good at this.

6 page 16 - Let hunters walk or ride horses. It might save pilferage of artifacts such as petroglyphics.

7 page 17 - After seeing a Bermuda grass lawn at the bottom of the Grand Canyon, I can't trust government re seeding. Let nature do it as always

8 page 18 - Wood harvest is not worth damage caused by roads. Issue permits to an area about once in 20 years. Use tractors or horses. Restore ground cover

9 page 24 - Mt. Graham should have towers available to such emergency services as the Civil Air Patrol, Ham Radio Net and police. Hopefully, it can be done with less scenic damage than the shacks on the Tucson Mtns

10 page 28 - We need a large supply of insects in a sanctuary. These are a food supply for beneficial insects such as ladybugs and parasitic wasps which replenish those killed in sprayed farms. Drift from farms is problem enough. Minimize spray in natural areas and even roads or lumber areas. Use natural control intelligently. Please do not use "IPM" to describe a hunt and shoot spray program. Promote beneficials. Feed them and give them sanctuary.

Thanks for your consideration.

Roy J Barker
ROY J. BARKER

Agency response to
Roy J. Barker

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. The current transportation system is considered to be adequate for most anticipated uses. New road construction will be based on needs to meet specific resource management objectives. The Forest Plan predicts this need will be limited to low standard roads for wood harvest and mining activities. Approximately ten miles will be needed for wood harvest. We are unable to predict the need for mining but expect it to be minimal. Once a road is no longer needed for resource use or management, our intent is to close it either temporarily or permanently. Road management emphasis will be on maintenance and reconstruction of existing roads.

3. Timber sale contracts require revegetation of disturbed areas. As a general rule, roads are not constructed on the Coronado N.F. for timber sale activities. Timber sales utilize existing roads. If a skid trail is constructed it is closed, water barred, and revegetated as required by the sale contract. We appreciate your assistance at Rose Canyon and regret your bad experience.

4. The purpose of the planned policy for managing motor vehicles is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

5. All proposed activities are subjected to an analysis to determine visual impacts. Measures to mitigate any impacts are prescribed as part of the project development. Sometimes, as in the case of Mt. Hopkins, the impacts can not be totally mitigated. Hopefully, we can learn from others such as the Swiss.

6. See response numbers 2 and 4.

Agency response to
Roy J. Barker
(continued)

7. We do not anticipate that a majority of resource objectives under the Forest Plan will require nonnative plants. We will always use native species over nonnative species if native species will accomplish our objectives. On some sites which have been denuded by fire or overgrazing, our past experience has shown that native species will not survive and provide effective ground cover. In these cases nonnative, naturalized species such as orchard grass or Lehman's lovegrass are used to establish ground cover to prevent further erosion.

8. Fuelwood harvest on the Coronado National Forest is an activity used to meet other resource objectives such as providing recreational opportunities and providing wildlife habitat. Some access roads are necessary to manage stands to meet these resource objectives. Only ten miles of roads are planned during the Plan period. Tractors or horses are not appropriate because most of the fuelwood sales are to individuals. The average time between harvest for each individual area is estimated to be 40 years. Appropriate ground cover will be restored either by natural means or through artificial seeding following harvest.

9. Although the Forest Plan and EIS identify potential electronic sites, including West Peak and Mt. Graham, additional site specific analysis will be required before they could be occupied. The current analysis only identifies them as being suitable for future electronic needs. The additional analysis would determine the extent and type of development that is compatible with other resource uses. If there is a need for services such as you suggest, a proponent must come forth with a specific request. The Forest Service has an interest in the Mt. Graham site, but only for its internal communication needs.

10. We agree that no insect species should be completely eliminated from the environment. The objective of "integrated pest management" as practiced by the Forest Service is management of pest species, not extermination. Please note the following definition of IMP.

    Integrated pest management - A process for selecting strategies to regulate forest pests in which all aspects of a pest-host system are studied and weighed. The information considered in selecting appropriate strategies includes the impact of the unregulated pest population on various resource values, alternative regulatory tactics and strategies, and benefit/cost estimates for these alternative strategies. Regulatory strategies are based on sound silvicultural practices and ecology of the pest-host system and consist of a combination of tactics such as timber stand improvement plus selective use of pesticides. A basic principle in the choice of strategy is that it be ecologically compatible or acceptable.

11/6/85

TUCSON, ARIZONA
NOV 8 1985
RECEIVED

Brent Bassford
442 W. Canada
Tucson, Az 85706

0693

Dear Mr. Tippeconic,

My comments on the "Summary Environmental Impact Statement for the Coronado National Forest Proposed Plan" are as follows

— I request the maximum amount of special designation areas (SDA's) be allocated (PA+ SDA's of Alt. D)

1 [Why: They prohibit mining & energy exploration. I am very concerned about the effects of these activities on the land. Their appearance and the roads necessary to support them have a detrimental effect on the forest, both to wildlife and visually. The visual appearance of the land is very important to me. Conservation is the way to energy independence. "Energy Independence via Exploration" is simply a way to sell people on having public land line someone's pockets.

2 [— No Tram on Mt. Graham

Why: An aerial tramway would have a severly detrimental impact on the visual quality of the forest. The tram is not necessary The observatory also has a negative impact on visual quality, however, one can look away from it and have it removed from one's sight. (The observatory may also have some larger purpose in being where it is.) It is localized The tramway is not localized. It is strung all the way down the side of the mountain. It is nearly impossible to remove it from one's field of view.

My overall recommendation is the PA + the SDA's of Alt. D — the tramway.

Thank you for your consideration of my commentary, and that of others.

Sincerely,

Brent Bomford

Agency response to
Brent Bassford

1. Development of mineral resources is a legitimate use of National Forest lands and must be considered in conjunction with other resources and uses. With the exception of a wilderness designation, "special designation areas" do not automatically restrict development of mineral resources. Mineral withdrawals or restrictions on mineral development activities are considered on an area by area basis depending upon the various resource needs.

2. The idea of an aerial tram on Mt. Graham to compliment a possible astrophysical area is no longer being considered.

0006

Bella Vista
Ranches
INC. of ARIZONA 1201 FRY BLVD. • SIERRA VISTA, ARIZONA 85635
• PHONE: (602) 458-5470

July 10, 1985

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Az. 85701

Dear Sir:

We are in receipt of your letter of June 26, 1985 with "Draft Summary" inclosure, to which this response is addressed.

We have not completed an "indepth" study of subject draft but have read it with consideration and interest,

In subsequent discussions with Mr. Cracchiolo we want to pass on the following opinions.

The spirit of reducing governmental expenditures is certainly a laudatory endeavor. We applaud that effort. And certainly the elimination of the duplication of administrative and supervisory staffs will contribute considerable savings.

We are aware that existing administrative facilities will dictate, to a degree, the allocation of areas of responsibility, however we feel that " Forestry" Lands as apposed to "B.L.M. Lands", by their very nature, should be given special consideration in such allocation.

We have experienced considerably less resistance and more accomodation from B.L.M. on leases, exchanges and purchasing of their land than from the "Forestry" hierachy. That probably derives from different rules for such matters but should be considered going in to this contemplated re-organization toward simplefication.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
JUL 15 1985
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We certainly share with you the philosophy that all such lands belong to us all and should be so managed. We recognize the diversity of interests that you must placate and not offend.

We shall procure a copy of the more detailed proposed plan and study it and be prepared to comment on those parts that are pertinent to our area.

Thank you for the advance information . We are

Very truly yours,

Kenneth E Johnston

Kenneth E. Johnston
General Manager

cc. Joseph U. Cracchiolo, Jerry Dieter
Dennis Brandolino.

Bella Vista
Ranches
INC. of ARIZONA
1201 FRY BLVD. • SIERRA VISTA, ARIZONA 85635
• PHONE: (602) 458-5470

June 14, 1985

Mr. Jerry Dieter
Mr. Dennis Brandolino
U.S. Forest Service
Sierra Vista Ranger Station
Highway 92 By-Pass
Sierra Vista, Arizona 85635

Gentlemen:

Firstly let me thank you both, for Mr. Cracchiolo and myself, for the time we spent with you today and the discussion on lands.

We are including herewith various copies of antique documents that Mr. Hollenstein has passed to us. They are for your use and file.

As we discussed, we are intersted in an exchange of the Hollenstein property, which we have acquired, for forestry land contiguous to our Rail Oaks Ranch property in Section 12, R20E, T23S, G&SRB&M, Cochise County.

This matter is not inclusive of the previously discussed exchange of the Forestry Building that you now occupy under lease.

Very truly yours,

Kenneth E. Johnston
General Manager

KEG:bl
Enclosure

CORONADO N. F.
JUL 25 '85

0023

Box 6235
Salt Lake City, Utah 84106

July 21, 1985

Forest Supervisor
Coronado Nat'l Forest
Tucson, Ariz.

Dear Sir:

RE.: COMMENTS ON CORONADO NAT'L FOREST PROPOSED PLAN & DRAFT E.I.S.

My comments are of a general nature and include the following:

1 (a) stop road-building into uneconomical timber stands, and reduce deficit timber sales;

2 (b) stop livestock overgrazing-- remove excess livestock from areas in fair or poor condition;

3 (c) do not go forward with any more "range improvements" until such "improvements" pass a reasonable cost-benefit analysis;

4 (d) go on public record urging "freemarket" grazing fees as being the only fee fair to all ranchers and tax-payers in the long-run; such a fee would increase respect for the public land and the federal land-managing agencies and balance revenues better for your agency to do a better job;

5 (e) give more consideration to native wildlife and native vegetation and less to livestock and exotic vegetation; wildlife should have at least equal--if not priority--consideration on all our public lands;

6 (f) let wilderness areas designated by Congress manage themselves as much as possible; institute minimum management and deny human access when necessary to protect natural values;

7 (g) ~~maximize your~~ zoological-botanical areas as per alternative "D;" excessive restrictive protection can always be removed in the future, but loss of natural values--especially of research value--may be permanently lost;

8 (h) protect from destruction as much as possible your remaining roadless non-designated wilderness areas; let the future decide whether these areas will be more valuable for their commodities or as additional wilderness and natural research areas;

9 (i) recommend against the Mt. Graham astrophysical complex; suggest astronomers add to already existing sites.

Yours pleased to comment,

Elliott Bernshaw

Elliott Bernshaw

P.S. (1) Please note my change of address from Canada; and (2) please send me the separate EIS on the MT. GRAHAM ASTROPHYSICAL PROPOSAL.

Agency response to
Elliott Bernshaw

1. The Coronado National Forest manages timber resources primarily for recreation and wildlife values. Any roads constructed are for the purpose of managing the stands to keep them healthy and compliment the above values.

2. We agree that it will be necessary to temporarily reduce grazing, while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the first period and 338,000 in the second period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about ten percent less than present.

3. All Allotment Management Plans are subjected to a careful benefit/cost analysis. Only when there are overriding environmental or social values are improvements constructed which do not exhibit a favorable B/C ratio.

4. The question of livestock grazing fees is outside the scope of this Plan.

   The Forest Service and Bureau of Land Management recently conducted a study of public land grazing fees. A joint agency recommendation was made to Congress in 1985. Congress will now decide on a new fee schedule.

5. Wildlife habitat has long been a primary concern of the agency. All projects and plans are closely coordinated with wildlife needs. The Coronado Plan preserves or enhances wildlife habitat. A source of pride is the strong consideration for nongame and endangered species. Where practical, native plant species are favored over exotics. This is reflected in all land management prescriptions.

6. Management options in wilderness areas are limited, for the most part, to enhancement and maintenance of wilderness values. Limiting human access has become necessary in some areas but none on the Coronado to date. As populations and visitation increase, the need for capacity studies will become necessary and some controls may be necessary.

7. A zoological-botanical designation does not imply a set "level of protection". It is used to recognize areas that have significant examples of flora or fauna. Public use and enjoyment of these areas is encouraged while protecting those values. Lack of this designation does not mean existing values will necessarily be lost. Other management prescriptions can provide the necessary protection.

8. "Remaining roadless nondesignated wilderness areas" are not a separate management category at this time, but are managed under the concept of multiple use which considers both commodity and amenity values. The Forest Plan does emphasize retention of nonmotorized recreation opportunities. This emphasis and the limited amount of development planned should retain the roadless character of most of these areas.

9. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0714

3237 East 2nd Street
Tucson, AZ 85716
October 10, 1985

Mr. R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, AZ 85701

RE: Proposed Coronado National Forest Plan

Dear Mr. Tippeconnic:

I am writing in response to your draft Environmental Impact Statement and Proposed Plan for the Coronado National Forest. While I wish I could comment on the entire document, I do not have the time nor the expertise in order to adequately evaluate all the aspects of the proposed plan. I will, therefore, limit my comments to the plan as it relates to the Chiricahua Mountains, and specifically the lands within the South Fork of Cave Creek. I am extremely familiar with this area, having spent most of my life visiting the South Fork and enjoying its many recreational opportunities.

I would first like to comment about the zoological-botanical
area designation that is contained in the proposed action,
and alternatives B, C, and D. (I would note at this point that
alternative E is listed as being the same as alternative A with
1 no ZBAs established, however, alternative A also has no ZBAs to
be established, I don't understand what distinction if any there
is between A and E.) While the definition of ZBAs calls for outstanding
or unique examples of fauna and/or flora, nowhere in
the management practices do I see any provision either identifying
the outstanding or unique flora or fauna in the South Fork
area nor do I see what management practices are specifically
2 identified to preserve such flora or fauna. It seems to me
premature to identify a ZBA unless you are concurrently proposing
management practices that will protect the ZBA. I would
then oppose any designation of ZBAs within the South Fork area
until such time as the management practices to deal with the ZBA
have been specifically identified, outlined and published for
public comment.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 11 1985
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3 I would like to further comment on the proposed action for the South Fork as it relates to converting the campground for day use. The impetus seems to be the damage being caused by vehicle use and the increase in size of the campground caused by inappropriate use. To try to remedy the situation by converting the campground to day use seems to me to be a classic case of overreaction. Could not the improper use of the campground be more appropriately stopped with barriers preventing vehicles from proceeding where they should not go and/or citing offending campers when they go out of designated camping areas. This particular campground has, for at least the last 20 years that I am aware of, been an extremely popular campground due to its location at the trail head and its size as one of the smaller campgrounds in the South Fork area. Additionally, to limit this campground to day use while not concurrently increasing the facilities at other campgrounds will not solve the problem, but simply transfer the demand and abuse to other campgrounds. While I am not entirely aware of what additional management is necessary to handle a campground as opposed to a day facility, it seems to me that while the proposed action provides for bettering the water and sanitary facilities and vehicle control, this activity could just as easily be done while allowing the campground to remain. The differences in the amount of Forest Service personnel supervision to date does not seem to me to justify the difference between a day use site versus a campground site.

4 I would also like to comment and state my vehement opposition to alternative C and alternative D. These alternatives provide for the road leading to South Fork to be closed and for sanitary facilities and a parking lot to be built at the junction of the South Fork and main Cave Creek road. Here again it seems to me this is an extreme alternative that bears no rational basis to serve any valid public purpose. If, in fact, the South Fork enjoys unique or outstanding flora or fauna, why then would an acceptable alternative be to prevent large numbers of people from enjoying this flora and fauna. As I have stated above, and as your own studies show, the campground in the South Fork is an extremely popular and heavily used area. To prevent such use and enjoyment serves no appropriate purpose.

5 Finally, I would like to comment on the management practices, in particular DU 1(5). The standard would have the existing recreation residences be managed in accordance with those in the Santa Catalina and Rincon Mountains. Such a grouping is entirely inappropriate given the wide disparity

5 between the South Fork and the Tucson metropolitan area. The proximity of the cabins in South Fork to the remainder of the recreational facilities in the area is nowhere near as intense as those in Madera Canyon or the Catalina Mountains. Nor are there the conflicts, or even the potential for conflicts, in the South Fork that exist in the Rincons and the Catalinas. Similarly, the demand and numbers of people using the facilities in South Fork is substantially less than those near Tucson. To lump them into the same management area is entirely inappropriate.

I appreciate the opportunity to comment on the proposed actions and look forward to seeing the results.

Sincerely,

John J Brady

John J. Brady

JJB:jt

Agency response to John J. Brady

1. With regard to the question of designating zoological-botanical areas there is no distinction between Alternatives A and E. Neither alternative would recommend this type of designation. When it comes to management of other resources there are differences between Alternatives A and E.

2. The management prescription (practices, standards and guidelines) for Management Area 14 provides the management direction and necessary protection for the two proposed zoological-botanical areas, including the South Fork of Cave Creek. The prescription also suggests the flora and fauna to be emphasized. As implementation and monitoring takes place, additional standards and guidelines may be necessary to meet stated objectives for the Management Area.

3. Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

   Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

   During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

   The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

   The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

   We see very little difference to the Forest in managing a campground versus a day use site. They each have their unique management problems and requirements.

4. Alternatives C and D represent other approaches to enjoying the special qualities of South Fork. While you may find them extreme, others see them as valid alternatives, and for this reason they were considered along with the other alternatives for managing South Fork.

Agency response to
John J. Brady
(continued)

5. We feel it is appropriate to include recreation residences within the same management area. The management direction for these residences is to be the same for the period of time covered by the Forest Plan (usually 10 years). This "lumping" or "grouping" in no way implies anything regarding future tenure of the residences. Each separate residence or summer home area must go through a separate tenure analysis to determine whether they are to be retained or phased out based on a higher priority need. This kind of analysis led to the current decision to retain residences not already on tenure notice.

0640

P. O. Box 884
Douglas, AZ 85608
October 10, 1985

CORONADO N. F.
OCT 11 '85

Action X		Action X		Action X		Action X	
Info	Init	Info	Init	Info	Init	Info	Init
FS		RES		LA		D	
LMP		RAF		ARCH		N	
AO		PER		WL		SV	
ENGR		AS		WS		S	
RBE		CS		SLS		SC	
RLT		LR		DISP		NARTC	
FIRE		RECP		PIO/IS		COMM	

Mr. R. B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic:

I would like to present my comments about the Environmental Impact Statement for the Coronado National Forest Proposed Plan, specifically as it relates to Management Area 14 - South Fork Canyon and Guadalupe Canyon. My comments will be referring to the Summary.

1 The Zoological-Botanical Area designation seems to be a good way to protect the canyon and resolve the disputes regarding its management. I would like to emphasize the word seems, however, because we have been unable to obtain more than a general definition of such a zone and how it would be managed. It will be interesting to watch the development of an obviously new idea. We hope there will be input and good will on the part of all involved.

2 Speed limits on the South Fork road do not generally work since there is no enforcement attempt. Speed bumps, if maintained, could do the job particularly at such straight stretches as the approach to the creek coming from the campground.

3 I would like to strongly protest the conversion of the campground to day use only. The campground has been deteriorating, but campers bear only a small portion of the blame. Much of the damage has been done by day-users, arriving after a bird alert in vehicles as large as Greyhound buses to small VW's. Trying to find parking space for the many vehicles arriving in one day on the weekend has pushed back the boundaries of the campground. Campers have taken advantage of this situation, especially when campgrounds are full. My observations of the past two years has been that the rush is over, and a more reasonable number of users of the facility at any one time is presently occurring. I would suggest that the campground be rehabilitated with barriers to parking and camping outside of designated areas. With enforcement of regulations on weekends when most of the use occurs, perhaps we could continue to study the use of this campground as such.

4 Since there is already a well-used footpath above the campground, I assume the reference is made to a new path from the roadforks. This seems completely unnecessary to me. Even at its busiest, there is not enough traffic to endanger pedestrians on the road; there are plenty of places to step to the side, and it is easy to hear an approaching vehicle. In many spots there is no room for a path in addition to the road. If the area is to be maintained in its present state, benches and turnoffs would be a sad addition. In a mountain range containing the Wonderland of

4 Rocks, there appear to be a sufficient number of large rocks for those too tired to continue.

5 A ZBA designation for Guadalupe Canyon seems to suffice to protect the bird-life in this area. However, I think it would be a gross injustice to restrict the present amount of grazing. Cattle and birds co-exist very nicely.

We sincerely appreciate the accommodation made to the recreational residences and the road as it now exists. Mr. Bruner and his staff and committee members are to be congratulated on their resolution of a thorny problem.

6 My final comment is one I made for the previous Impact Statement, but its validity continues. By the mere designation of a ZBA the Forest Service will be attracting many visitors who are unfamiliar with the few but very real dangers of western mountain ranges. I would hope the Forest Service would arrange some system of informing neophytes of problems which could arise in these canyons.

Very truly yours,

Margaret S. Brady

Margaret S. Brady

Agency response to Margaret S. Brady

1. Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Management prescriptions must be developed for each area depending on the particular biological resources to be featured. The management prescription for the South Fork of Cave Creek and Guadalupe Canyon can be found in Management Area 14 of the Plan.

2. We agree some type of control is necessary now to reduce vehicle speeds to protect all users. Speed bumps may be the most appropriate.

3. Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

   Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

   During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

   The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

   The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

4. The walking trail and benches mentioned in the draft EIS were a mistake and have been deleted in the Final EIS. The intent was to utilize the existing road for a foot trail as well as a motor vehicle travelway.

Agency response to Margaret S. Brady (continued)

5. Management of Guadalupe Canyon will remain essentially the same. However, the riparian area in Guadalupe Canyon has been adversely impacted by past livestock use and studies are currently underway to determine the condition and potential stocking rate of the Guadalupe Allotment. A combination of stocking and management will be planned in the next couple of years which will improve riparian condition. The zoological designation is to recognize the special wildlife values found there and to provide for the continued public enjoyment of those values.

6. The management prescription for Management Area 14 provides for information and education programs in South Fork as you suggest.

0655

P. O. Box 884
Douglas, AZ 85608
October 10, 1985

Mr. R. B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic:

I would like to submit my comments about the Draft Environmental Impact Statement, particularly as it relates to Management Area 14 - Lands within the South Fork of Cave Creek and Guadalupe Canyon. While I agree with most of the DEIS proposals, I wish to express my objections to some of the ideas submitted:

1. I object to the South Fork of Cave Creek being designated a Zoological-Botanical Area.

1 a. The local Forest Service office has been unable to locate another ZBA area in the U. S. nor has it been able to explain to my satisfaction what a ZBA is; we are being asked to buy a pig in a poke, and I do not think we should.

2 2. I think that the campground of South Fork should remain a campground and not be converted to day use only.

a. There are not enough campgrounds in Cave Creek now, and it is not fair to remove one.

b. The major damage that has been done to this campground, I believe, is the result of hordes of birdwatchers in tour buses and other vehicles trying to see the coppery tailed trogan and now the flame backed tannager. It seems to me that the researchers have done their share of damage to this campground with their pushing back the boundaries of the camp with their small cars, trying to get up the trail as far as possible.

c. In the light of the above, the Forest Service being unable to control the campground with the personnel it now has, how can it properly control a day camp with less personnel?

3 3. A walking trail with benches along the South Fork road is not necessary. There is no room to build the trail, and sound carries in the canyon so that a hiker has plenty of time to move out of the way of an approaching vehicle.

4 4. Speed bumps may be necessary at a later date.

5 5. Regarding Guadalupe Canyon, I believe this area should be managed as it is being done now.

I believe that Mr. Brunner and his advisory committee have done on the whole a good job while working under difficult conditions.

Sincerely yours,

Peter R Brady

Peter R. Brady

Mr B. Brunner -
Dgls Ranger Dist

Dear Mr Brunner -
Please add this to my letter of 10/10/85 -

2 I believe that the South Lake camp ground should stay as a campground for another reason - it is often used as the first overnite camp for Boy Scouts & often as a training camp for furthering Boy Scout camping skills

If, as you say, an architect is going to plan the picnic ground; why not a camp ground?

Sincerely
PRB

DOUGLAS RANGER DISTRICT
Received 10-11-85

	Action	Info.	Initials
BTR			
EMA			
PAY CLK			
REC CLK			
RANGE			
R&L			
REC FOR			
REC TECH			
FMO			
AFMO			
RGE CON			
WL BIO			
PORTAL			
RUCKER			

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
[illegible] 1985
RECEIVED

Agency response to
Peter R. Brady

1. The Forest Service has been given the authority to establish special recreation areas in the Code of Federal Regulations, Section 294.1. While special areas may be designated for any of a number of special recreation purposes, one important purpose is to provide special management emphasis to outstanding examples of the Nation's natural history values. Such values include outstanding geological formations; significant fossil evidence; relict flora and fauna; scenic grandeur; habitats supporting rare, vanishing, or restricted species; seasonal havens for concentrations of native animals; ecological communities illustrating the process of plant succession; and climax communities. Areas having these natural history values which are of particular importance and clearly merit recognition and special management direction beyond that normally provided through integrated resource planning are considered for designation as a special area.

   There are five types of special area designations. Scenic areas are places of outstanding or matchless beauty which require special management to preserve these qualities. Geological areas are areas with outstanding formations of unique geological features of the earth's development including caves and fossils. Botanical areas are areas containing specimens of group exhibits of plants, plant groups, and plant communities which are significant because of form, color, occurrences, habitat, location, life history, arrangement, ecology, environment, or rarity. A zoological area contains authentic, significant and interesting evidence of our American National heritage as it pertains to fauna. Paleontological areas contain relict specimens of fauna and flora.

   The Forest conducted an informal survey of other Forest Service Regions which revealed that there are over 25 botanical areas alone along with a number of other special area designations. There is one area in Arizona; the C. Hart Merriam Science Area on the Coconino National Forest. Clearly, the definition and purpose of these special areas is well defined and there is precedent for zoological or botanical area designations.

   Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the plan, and others were considered as suggested by various respondents.

2. Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

   Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The Three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

   During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

Agency response to
Peter R. Brady
(continued)

The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

We see no significant difference in the cost of managing campgrounds versus day use sites. Each type of development has its own unique management and enforcement problems.

3. The walking trail and benches mentioned in the draft EIS were a mistake and have been deleted in the Final EIS. The intent was to utilize the existing road for a trail also.

4. We feel some type of control is necessary now to reduce vehicle speeds to protect all users. Speed bumps may be the most appropriate.

5. Management of Guadalupe Canyon will remain essentially the same. However, the riparian area in Guadalupe Canyon has been adversely impacted by past livestock use and studies are currently underway to determine the condition and potential stocking rate of the Guadalupe Allotment. A combination of stocking and management will be planned in the next couple of years which will improve riparian condition. The zoological designation is to recognize the special wildlife values found there and to provide for the continued public enjoyment of those values.

0676

Kenna Broome
7525 Sabino Vista D.
Tucson, Arizona
85715

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 1[illegible] 1985
RECEIVED

Oct. 11, 1985

R. B. Tippeconnic
Coronado National Forest
300 W. Congress
Tucson, Arizona 85701

Dear Mr. Tippeconnic,

I would like to take this opportunity to congratulate you and your staff on a really well prepared proposal for the management of the Coronado Forest. It does reflect some changes that were suggested in the last comment period and hopefully the final draft will reflect the imput from the letters and calls that you recieve now.

On the subject of Wilderness I would like to strongly
encourage you to recommend Wilderness Designation for all
1 three areas currently under study: Bunk Robinson, Whitmire
Canyon and the Pinaleno mts (mt Graham). Both Bunk
Robinson and Whitmire Canyon are unique areas that need
strong protection to guard their unusual plant and
animal life, the relative remoteness from urban centers
may not be adequate protection in the future. In the
case of the Pinaleno Mountains (mt Graham) I would urge
recommendation of Wilderness designation not only for the
limited area in the proposed plan but for a larger
area, at least as much as alternative "B" suggests. As
more and more information on this mountain range is
coming to light it becomes clearer that it needs the
fullest protection. The transportation corridor seems
to be unnecessary, an aerial tram is really not a viable
plan for any purpose and a regular helicopter route
2 would be quite detremental to the wildlife. Realizing that
the very top of the mountain is already to impacted for

Wilderness designation and yet is full of unique
2 plants and animals I think it may meet the requirements
for designation as a Zoological and
Botanical Study Area. I would very much like to
see this recommendation made.

One of the most striking features of the Proposed
Plan and the Environmental Impact Statement was the
projected future uses of the Coronado Forest. It
seems that one of the clearest projections is for
much greater recreational use of the entire Forest.
3 This projected increase is not verly clearly reflected
in the amount of the financial or manpower budget allocated
to preparing for this increased usage. The
allocations for trail maintenance and construction and
for upkeep of the developed campsites and interpretive
Centers is not in proportion to the projected increase.
I think the limited resources available should be utilized
for upkeep rather than the possible addition of
new centers in either the Santa Rita Mts. or the Chiracahua
4 Mts. We do also need better access to several trails,
the ones in the Catalina's come most immediately to mind
including Ventanna Canyon, Pima Canyon and Linda
Vista. I was delighted to realize that motorized vehicles
5 are not allowed on any trails in the Catalina Mts. and
I would strongly encourage such restrictions for the
entire Forest.

Since fuelwood gathering in the Coronado Forest is
more recreational than life necessity I do not see any
6 need or reason to construct roads for that purpose and
therefore I suggest the proposed fuelwood collecting

roads be deleted from the plan and that the funds
6 and manpower be utilized in more constructive ways.

The overgrazing problem continues and as the
need for beef continues to lessen rather than increase
it seems that we might hope to equalize the situation
7 faster than the projected twenty years. I do understand
the historical situations that allowed for destruction of the grasslands and erosion of the soil under it but as we progress in knowledge it seems that we should be able to utilize this information to produce a reasonable number of livestock while insuring a future for the grasslands. Stricter control on the number of cattle and more nearly realistic charges for the leases would seem to be practical steps toward insuring the future as well as putting the present into sharper focus.

I have only touched on a few of my most specific concerns and in light of the magnitude of the total Proposed Plan I see these as rather small requests for consideration.

Thank you for your help in protecting our world.

Sincerely,

Jeanne Broome

Agency response to Jeanne Broome

1. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA.

Agency response to
Jeanne Broome
(continued)

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The comment period will be at least ninety days as it was for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

   The question of a zoological/botanical area for the top of the Pinaleno Mountains will be addressed in the Mt. Graham Astrophysical EIS.

3. We feel the Forest Plan recognizes the recreational values and uses of the Coronado National Forest. The Plan also has to recognize future financial constraints on management of all the resources and protection of the basic environment to ensure future resource opportunities will not be foregone. With this in mind, approximately 19 percent of the total annual Forest budget goes to managing the recreation resources. While this financial emphasis may not be as much as we would like, the other resource uses must receive adequate management to ensure they do not impact the recreation resource. The Forest Plan places an emphasis on maintenance and management of existing recreational facilities before construction of new facilities. Although a number of new sites are shown as desirable and needed over the next 50 years, less than two percent of the projected annual budget is for new recreational development.

4. Better trail access is one of our priorities. We are currently working with Pima County and private landowners to provide needed access to trails in the Santa Catalina Mountains.

   Access to the trailhead for the Ventana Canyon Trail has been provided by the private landowners in their parking facilities. Negotiations are underway to develop a separate public parking facility. Access to the Pima Canyon Trail is via the Magee Road Trailhead Parking. Negotiations are also underway to secure a more suitable trailhead parking facility. A public parking facility is available on Linda Vista for access to National Forest land on the west end of Pusch Ridge.

5. Any need for motor vehicle use restrictions on other trails of the Forest will be monitored as we begin implementation of the Forest Plan. Specific needs can be handled on a case by case basis until the whole issue can be further analyzed.

6. Fuelwood harvest is an activity used to meet other resource objectives such as providing wildlife habitat needs and recreation opportunities. Prescribed burning is an alternative for meeting wildlife needs but will not provide the opportunity to utilize the wood fiber. In order to manage the stands to meet these objectives, adequate access is needed. These access roads often provide other recreation opportunities for the public. New road construction is projected to be minimal and will be only ten miles during the Plan period.

7. The Forest Plan gives direction to balance livestock grazing use with capacity. It predicts this will happen during the second decade. Since the first priority will be given to those allotments in unsatisfactory condition, we see no justification for the additional cost and impacts of achieving this balance sooner by simply reducing livestock numbers. Since 1980 the number of problem grazing allotments has been reduced from 76 to 41. At this rate we are optimistic the balance will occur sooner than predicted.

0010

7/19

Dear Sirs,

Enjoyed your impact study very much. I beliwve that Alternative D would be the best of those listed. I wish you the best in preserving our Divine gifts to mankind. God bless

P.W. Burbutis

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
JUL 22 1985
RECEIVED

Agency response to P. W. Burbutis

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

0060

James Cain
8241 E. Zemsky St.
Tucson, Arizona 85710

August 10, 1985

R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic,

After reading your proposed Coronado National Forest Plan, I find alternative "B" the least offensive.

1 You have stated that nonmotorized recreation such as hiking, hunting, camping and swimming accounts for 70% of all recreation. I don't know where you get your information? I disagree! A large percentage of these people use vehicles to get them off the main road into the back country to start their hunting, hiking, etc. You also say there are conflicts between vehicles and hiking, hunting and fishing. I would like to know what these conflicts are! I enjoy all of the above sports. Other than a few selfish egotistical arm chair preservationists who want the entire forest to themselves, I don't think there is any conflict.

2 I am against any more wilderness! We have too much already!

I have lived in Arizona for thirty eight years. I am a conservationist. I believe in wilderness, but you have destroyed the true meaning, by taking in areas such as the Galiuro Corridor. You are not preserving as the act was intended, you are trying to create wilderness. This makes me want to abandon the entire concept.

3 I am also very much against your new policy that roads are closed unless posted open. I have never heard of a more ridiculous plan. This is something I would expect to see in Russia, not in the United States of America!

I enjoy all outdoor sports. I have seen much of this beautiful state from a jeep. It saddens me to think that my children and grandchildren will not have the same opportunity.

Sincerely,

James Cain

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 1[illegible] 1985
RECEIVED

Agency response to James Cain

1. Nonmotorized activities (See Table 19, page 60 DEIS) do account for 70 percent of all use. Most of these activities are the result of access by motor vehicle and the time spent driving is counted as a motorized activity. The other time spent on the Forest, such as hiking, is counted as a nonmotorized activity. Use figures are compiled annually from actual counts and estimates from field personnel.

   Conflicts between recreational uses have occurred in certain parts of the Forest where total use is very high. For example, conflicts between foot traffic and motorized traffic on hiking trails was part of the reason a decision was made several years ago to have only nonmotorized traffic on trails within the Santa Catalina Mountains.

2. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by the proposed management of these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

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Agency response to
James Cain
(continued)

Guadalupe Canyon would be protected through the management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private lands within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

The Galiuro Corridor was added to the Wilderness System by the 1984 Arizona Wilderness Act. This Act was developed by the Arizona Congressional Delegation after receiving input from many individuals, organizations, and agencies, including the Coronado National Forest.

3. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. Approximately 70 percent of the Forest now provides the opportunity for some form of motorized recreation activity. (See Table 21, page 62, DEIS). This represents that portion of the Forest that is now covered by the approximately 2800 miles of roads. Before any specific roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements.

Signing or designation of roads open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is much work yet to be done to sign all roads. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off the road use of vehicles is not acceptable. Any direct enforcement of the policy will have to be implemented in stages along with the signing.

0005

Jim Cain
8241 East Zemsky St.
Tucson, Az. 85710

Mr. Mark Kaplan
Coronado National Forest
300 West Congress
Tucson, Az. 85701

Dear Mr. Kaplan;

Thank you for sending the information and wilderness map. I am very concerned about your new policy that a road is closed until posted open. That just isn't the American way, its like saying you are guilty until proven innocent. This is our land, we all pay taxes to support it. I feel everyone has a right to use it as long as they do it in a responsible manner. We are not against restricting forest travel to existing roads, trails, and washes, but we don't need any more closures.We have too much land closed already!

You want our help picking out our favorite roads that we want kept open, they all are! Four wheelers are explorers. We don't want to go to the same place all the time.

I realize you have management problems, budget cuts, etc., but closing off the forest to the people that own it is not the answer. We have considerable time and effort invested in the Coronado National Forest, installing cattle guards, transplanting cactus, and cleaning up trash, etc. etc. Four wheelers have done more work in the forest than any other group that I know of. I can't believe you would adopt a plan that would effect them so drastically. I am hoping that you will reconsider.

Sincerely;

Jim Cain

CORONADO N. F.

JUN 27 '85

Action X Info ✓ Init	Action X Info ✓ Init	Action X Info ✓ Init	Action X Info ✓ Init
FS	RES	LA	D
LMP	B&F	ARCH	R
AO	PER	WL	SV
ENGR	AS	WS	S
ABE	CS	SLS	SC
RLT	LE	DISP	RARTC
FIRE	RECP	FIG/IS	COMM

Agency response to Jim Cain

We recognize and appreciate the time and effort expended by four-wheel drive groups on the Coronado and other Forests. We consider the four-wheel drive vehicle owners to be legitimate users of the National Forest.

The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit. Based on your comments, you seem to agree with this concept.

The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. Approximately 70 percent of the Forest now provides the opportunity for some form of motorized recreation activity. (See Table 21, page 62, DEIS). Some confusion may exist because of our system of defining motorized vs. nonmotorized activities. Nonmotorized activities (See Table 19, page 60 DEIS) do account for 70 percent of all use, however, most of these activities are the result of access by vehicle. Before any specific roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements.

The assistance we could use from the four-wheel drive groups or other users is identifying existing roads we may have missed in our initial inventory.

Signing or designation of roads or trails open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads or trails are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is much work yet to be done to sign all roads and trails. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off the road use of vehicles is not acceptable. Any direct enforcement of the policy will have to be implemented in stages along with the signing.

0641

1322 Condesa Primera
Tucson, AZ 85718
10 October 1985

CORONADO N. F.
OCT 11 '85

Mr. R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, AZ 85701

Dear Mr. Tippeconnic:

1 I wish to comment on the proposed Coronado National Forest Plan and DEIS03-05-85-1. First let me say how valuable the Plan and DEIS have been in teaching my "Environmental Biology" course. This is a science for non-science majors course in which I combine basic ecology and applications to human environmental problems. We take the students for an all-day field trip up to Mt. Lemmon that includes vegetational zonation, sampling techniques, physical environment measurements, and this time, examination of different land-use areas. In lab sessions preceding the trip, they were introduced to the Plan and DEIS, and it went with us, and the maps were especially valuable. The students signed up for 4 study teams in each lab: comodities, water and soil,recreation, and biotic diversity. Next week the teams will make oral presentations of their conclusions.

Since I try to teach them how to evaluate, rather than to inculcate a particular view, I have stressed that the judgements are to be theirs, and that they, as good citizens doing citizen's homework, should submit their views to your office independently. Now it is time for my personal view.

An experience in the Coronado last weekend perhaps typifies what this resource means to a large number of people. Finishing a detailed research proposal last week had left little time to prepare two papers for a professional meeting so I couldn't take a long hike that I really needed. However, a visitor from California and I arose at dawn and jogged 5 miles to the nearest wilderness area last Sunday. We went past the old cattle-loading chute at the mouth of Pima Canyon, and into the canyon. A crashing of rocks at the base of Rosewood Point drew attention to some bighorn sheep. There was an old dignified ram, another adult back behind some sahuaros, and the source of the falling rocks, 3 yearlings and 2 small enough to have been this year's lambs. The 5 young ones were running and dashing back and forth, without a misstep despite the high speed of their play. That made our day, and recharged my spirits for another week.

2 The city is growing far faster than I wish. The cattle are gone from the south side and the cattle chute is weathering away. The population is becoming high tech, professional, better-educated, and highly stressed. The Forest becomes increasingly crucial for recreation, for watershed, and as an ecologically sound reserve, and of relatively less significance for commodity-production. Sustained yield of enough lumber, firewood, and beef for this large a city is out of the question, and arid, rocky land cannot produce at the rates of the mesic southeast or north-

2 west. How can this shift and the problems of rapid population be best accomodated? How can recreation use be appropriately dispersed and decongested?

3 The Mt. Lemmon Highway is winding and narrow, but a wider road can only add to the speed and congestion by inducing more entries beyond the carrying capacity set by automobiles. Yet it is only fair that more people have a chance to enjoy the cool contrasts of our mountains. After the beautiful color photo of the leaves on the Star yesterday, I am sure that the road will be packed when we take a visitor from Sydney, Australia up there this weekend. We would be happy to use public transportation as we did to reach national parks and forests out of Sydney 2 years ago. The situation is another Sabino Canyon Road on a larger scale. Having served on the Sabino Canyon Study Team in 1974, and having collected the pro- and con- statements following the replacement of private autos by the Sabino shuttle service, I am sure that we advised and that the Forest Service took the right course. Law enforcement, quality of experience, trash management, environmental protection, and safety have all improved.

Considering this, the environmental impact (erosion) caused by new road cutting to widen, the problems you have with drivers who lack experience in mountain and winter conditions, and the cost of road improvements, I give enthusiastic endorsement of the Mt. Lemmon shuttle proposed by Rep. Kromko, Star outdoors writer Pete Cowgill, and local environmental organizations.

Along with that, I feel that a fee system would be appropriate for highway use. Anyone who can afford to drive up can afford a modest user fee on days when the buses are not running. This could offset to loss of revenues to county, state, and federal government as lumber and firewood cutting and grazing are phased out, and serve as a filter for the volume of traffic that is not related to the unique features.A lower annual fee or free pass for residents of Summerhaven would be appropriate.

4 The changing patterns of demand and use really mean that the land in the Coronado is worth far more for non-extractive uses. Grazing fees, timber sales, fuelwood collecting fees cannot amount to more than a drop in the bucket, so that the only harvesting should be that required for TSI and fire suppression. To penetrate the forest with new roads for fuelwood collecting (p.20,plan) is wrong for several reasons:

1. Tucson is not very cold, is abundantly blessed with sun for solar heating, and few of us who burn wood have efficient fireplaces. This just isn't the place for such.
2. The Plan and DEIS themselves acknowledge that the production cannot be sustained at a level sufficient for local demands. The roads will become obsolete, and only be another entry for management problems of trashing, vandalism, man-caused fires, and other law-enforcement needs.
3. Tucson sits under an inversion many nights of the year, and trapped under this is enough air pollution. While the aroma of pine, juniper, and mesquite are more pleasant than auto and diesal exhaust, smelter emissions, etc.,homefire smoke adds to the burden and to the problem of light pollution for the important astronomy research in the area.
4. The money could do more to improve visitor expereinces and

preserve resources if spent in visitor information, clean-up, and maintenance.

4 5. If fuelwood is to be harvested, small clear-cuts from existing roads might do less damage if carefully chosen.

5 Grazing permits at $1.35/ AUM cannot be cost effective, and are dead wrong when 1) 76 of the grazing allotments are in unsatisfactory condition, 2) grazing is 20% over capacity (maximum sustained yield of any resource occurs at maximum growth rates which occur at 50% of capacity!) and 3) unacceptable watershed conditions occur on 31% of forest lands, by your own figures.

6 Problems of erosion (e.g. Cargodera Canyon) and law enforcement are compunded in the penetration of forest land by motorized vehicles. The 56% of the Coronado open to the violent action of ORVs is excessive. Unroaded areas ahould be closed as in Alternative D . Outside of the National Forest there is plenty of less sensitive land of shallower slopes for them to explore.

7 Another major controversy is the Mt. Graham Astronomical Site proposal. I am very much impressed by the contributions of astronomy to our knowledge and culture. My father was an astronomer. I navigated by the stars as a Naval Aviator. I have personally unscrewed unnecessary floodlight bulbs at the entrance to our subdivision to reduce light pollution. I think it terribly shortsighted for NASA to cut the Halley's comet shot. So I really am not to be counted as anti-astronomy!

However interesting the universe and its vast spaces, we live here on THIS planet. There is no other place to live. We must protect and learn from our natural environment, and protect the diversity that remains. Mt. Graham is unique. There are observatories on many of our mountains- on Mt. Lemmon, astronomy is salvaging a facility built by the Air Force at the price of destroying a unique relict corkbark fir forest. On Kitt Peak, a site sacred to Native Americans have been forever changed. Terrible eroding scars are visible from afar on Mt. Hopkins. Light pollution will follow sprawl towards Mt. Graham. The quality of observations from platforms in space will make earth-bound optical observatories largely obsolete.

Hence I wish to register strong objections to the plan to alter natural vegetation and ecology for a Mt. Graham astronomical site.

With a view to the needs of the future, the romance of many past forest uses must be phased out and relegated to the historical museum as being cost-ineffective, environmentally damaging, and meeting the needs of very few people. Of the alternatives your study team has diligently prepared, 8 ALTERNATIVE D is the best plan, minus the Mt. Graham Astronomy Site.

I thank you for this opportunity to comment.

Sincerely yours,

William A. Calder III
Professor of Ecology and
Evolutionary Biology

Agency response to William A. Calder III

1. We appreciate your continued interest and past help in management of the Coronado National Forest. We also support your approach to education by combining basic ecology with practical applications for resource management. This focus on evaluation and practical resolution of resource issues is a great help to all public resource managers.

2. We agree with your assessment of the changing needs for Tucson and Southern Arizona. The values of the public lands that you mention are the same ones we have found to be true during preparation of the Coronado National Forest Plan. It is difficult to meet these needs given financial considerations and the desire to carry out our mandate to consider multiple use management. We believe our proposed Forest Plan provides increased emphasis on the recreational values while providing a mix of uses that other people value. The Coronado National Forest has always been concerned with basic watershed values and has made significant improvement since the National Forest was created.

3. The proposed reconstruction of the General Hitchcock (Mt. Lemmon) Highway is for safety and maintenance needs. The road will be maintained as a scenic highway. It will be reconstructed within the existing alignment and to the existing standard of two lanes with a 30 mph design speed. A separate environmental analysis addressing site specific concerns for the road has been conducted. The analysis indicated use on Mt. Lemmon will not increase significantly due to the planned improvements. Use will increase as the result of population growth in Pima County and the surrounding area. The road is not the means by which to regulate or manage the users of the mountain. The highway is the means to transport all of the people safely to their destinations on the mountain.

   The Forest Service has considered other transportation alternatives for the mountain, and will continue to evaluate these. Neither the Coronado National Forest nor Pima County has the funding necessary to subsidize public transportation on Mt. Lemmon. Any alternative would have to be self supporting. Mt. Lemmon is very different from Sabino Canyon because there are private dwellings on Mt. Lemmon and because the road is a public highway. We do not have the options of closing this road or charging for use as we did in Sabino Canyon. No matter what transportation alternatives become available, the Mt. Lemmon Highway will be needed.

4. We agree the main valves of the Coronado National Forest are in its recreational opportunities, including those related to the unique flora and fauna resources. We also believe moderate levels of other resource uses such as wood harvest and livestock grazing are compatible with the forementioned values. In fact, fuelwood harvest on the Coronado National Forest is an activity used to meet other resource objectives such as providing recreational opportunities and providing wildlife habitat. Some access roads are necessary to manage the stands to meet these resource objectives. Only ten miles of roads are planned during the Plan period.

5. The question of grazing fees is outside the scope of this Plan. This question is being considered by the Congress and Administration.

   Seventy-six of the grazing allotments are not in unsatisfactory condition. They have unsatisfactory management. Forest-wide, only sixteen percent of the rangelands are in unsatisfactory condition. The allotments with unsatisfactory management do contribute to most of the rangelands in unsatisfactory condition. Since these figures were compiled in 1980, the number of allotments with unsatisfactory management has decreased to forty-one. This kind of progress is an example of the Coronado Forest's commitment to eliminate overgrazing (capacity exceeding use) within twenty years or less. This objective is stated in all alternatives. Although watershed condition takes into account total hydrologic function, it is related to condition of the range lands (forage production potential) and will be improved along with improvements in ranges.

Agency response to
William A. Calder III
(continued)

6. The purpose of the Forest Plan policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. We have not identified any roads at this time that need to be closed for wildlife protection, but the Plan leaves us leeway to do this if necessary. Before any specific roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected uses to determine existing and future use requirements.

7. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

8. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

MICHAEL E. CEASE
2540 E. 8TH ST.
TUCSON, ARIZONA 85716

0718

October 11, 1985

R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Arizona 85701

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 11 1985
RECEIVED

Dear Mr. Tippeconnic:

I Am Submitting Comments On The Coronado National Forest's D.E.I.S. And Proposed Forest.

I Strongly Support Alternative D, The Citizen's Alternative.

Aldo Leopold Joined The U.S. Forest Service In 1910. The Values Of Our Society Have Drifted Far From The Value System He Articulated In What Is Known As The "Land Ethic."

Sincerely,

Michael E. Cease

Agency response to
Michael E. Cease

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

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0584

To: Mr. R.B. Tippeconic
Forest Supervisor
Coronado National Forest
Tucson, Az.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 8 - 1985
RECEIVED

Dear Sir:

I have reviewed the Summary of the Draft E.I.S. sent to me for comment. I feel that the alternatives given are something of strange mix. We have proposals to heavily exploit (use up) the scant resources set aside in the Forest (B+C), a proposal to do nothing (A) and three (PA, D, +E) which are apparently to be the choices of responsible people. The inclusion of Astrophysical sites within these last three leaves me with the distinct impression that the installation of these facilities on High Peak (Mt. Graham) is a foregone conclusion, and that by indicating which of these plans I might prefer, I am, by implication, supporting the installation.

I first became involved, and interested in, Mt. Graham's future through my involvement in opposing the selection of Mt. Graham as an Astrophysical site. It seems to me that throughout history, Astronomers have studied the stars with the long term goal of ~~someday~~ arriving there personally. The past 35 yrs. have provided Technology which is rapidly developing vehicles and platforms to satisfy that dream. With these capabilities then, we will logically continue our study of space from space, providing us with close-up looks and deep space views not possible previously, or ever, from the surface of our planet. If we must install bigger scopes here on earth, shouldn't we simply replace outdated equipment (If it weren't outdated it would be sufficient as is?) at current sites with new equipment as it comes available? This would satisfy the statement under "Mt. Graham Astrophysical

Proposal" regarding a supposed loss of research opportunities. It would also save a great deal of money in site development.

Regarding money, and the economics of the proposed astro physical installation, the Stewar Observatory people have publicly stated that the Safford area economy will NOT be affected by this installation. The Draft E.I.S. makes a similar statement, and the experience of the communities close to existing astro physical sites bears this out. The current level of support for this proj by the business community in Safford is, I believe, based on exactly the opposite hope. The Safford area is economically depresse due to mine strikes, work force reductions, A mine closings. The business community, in desperation, has determined to believe that th installation of telescopes on Mt. Graham will save them, when in fact, the parties involved have denied any economic benefit, and the experience of other communities bears out that denial.

The implication in the proposal that ~~the~~ the Coronado National forest must "complement" other astrophysical sites in Arizona simply puzzles me. I think we are under no such obligation. I further think that the public has no need to grant more and more public land and monetary resources to this elitist scienc which does so little to serve the public.

As the population of this country grows, the recreational lands available to each of us shrinks correspondingly. To grant block of public recreational or National Forest land for exclusive use does not fit my image of the future of these lands. The National Forest should be moving towards greater public accomodation and increased management of currently available land, not exclusive ~~of~~ or destructive uses, such as mining or grazing.

In closing, I must say that while none of the alternatives are completely satisfactory, with the exception of the

Astrophysical site, Alternative E seems to be the most efficient and forward thinking. It provides for an increase in Timber harvest, Fuelwood on a sustained basis, and planned Additional Access and recreational sites. this fits well with my ideas of future development under increasing demand for recreational space, and forest products. And, altho I disagree with grazing on public lands in Arizona, chiefly because of our water situation, Alternative E does propose a balance, rather than further deterioration.

Sincerely
Douglas C Hunter
Safford, Arizona
Oct 7, 1985

P.S. Please send me a copy of the E.I.S.

Agency response to Douglas Christie

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0603

Eleanor Christman
4943 E. Rosewood
Tucson, Az. 85711
October 7, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 9 - 1985
RECEIVED

R.B. Tippeconnic
Forest Supervisor
Coronado Nat'l Forest
300 W. Congress
Tucson, Az. 85701

Dear Sir:

I have studied the Summary of the Draft Environmental Impact Statement for the Coronado National Forest Proposed Plan and am struck by two things:

1 1- As a general rule, I am against mineral exploration & development in National Forests

&

2 2- I am catagorically opposed to the development of astronomical facilities on or near Mt. Graham. In fact I am against any increase in facilities on Mt. Graham. It is a unique & fragile environment and can only suffer from development.

The other proposals are in general good for the forests & the consumers. Thank you for allowing my input. Sincerely, Eleanor R. Christman

Agency response to
Eleanor Christman

1. Your preference has been noted, however, mineral resource development is a legitimate use of the National Forests and must be considered in conjunction with the other resources and uses. Mining activities are done under conditions specified in an operating plan designed to minimize impacts on surface resources without unduely interfering with the miners legal right to extract minerals.

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0572

MGChristman
529 E. Elm
Tucson, Az 85705
10/4/85

R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 W. Congress Street
Tucson, Az 85701

I have reviewed the proposed Coronado National Forest Plan I would like to see Arizona left as pristine as possible. If I had my way, we would have limited our growth years ago - keeping our state clean and natural.

I feel the proposed observatory in the Grahams would be a mistake Eventually they would widen and straighten the roads and this would increase the amount of visitors to this beautiful area.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 7 - 1985
RECEIVED

Thank you for your time -
Margaret Christman

Agency response to
Margaret G.
Christman

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0671

CONFIDENTIAL COMMUNICATIONS CO.

October 10, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 15 1985

RECEIVED

Mr. Robert B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85071

Dear Sir:

This is in response to your request for comments on the Summary Draft Environmental Impact Statement Proposed Coronado National Forest Plan.

We are pleased to note that all alternatives provide for the continuation of the existing electronic sites and the addition of three proposed new sites. Good communications facilities are absolutely essential to promote opportunity, and for the safe and efficient economic development of the area.

We would especially support the establishment of the Castle Dome site, and would point out that, because of mature trees on the site, any visual impacts caused by the installation of electronic equipment would be minimal, and would be far overshadowed by the economic benefit to the area. It would be our hope that the Forest Service would not be dissuaded from establishing these sites.

Sincerely,

M. J. Boulais

Marcel J. Boulais

5346 N. 91ST AVE. TOLLESON, AZ 85353 (602) 247-8223

Agency response to Confidential Communications Company	1. Although the Forest Plan and EIS identify potential electronic sites, including Castle Dome, additional site specific analysis will be required before they could be occupied. The current analysis only identifies them as being suitable for future electronic needs. The additional site specific analysis would determine the extent and type of development that is compatible with other resource uses.

0489

2638 N. LaVerne
Tucson AZ 85712
August 31, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 4 1985
RECEIVED

R.B. Tippeconnic
Forest Supervisor
Cornnado National Forest
300 West Congress Street
Tucson AZ 85701

Dear Mr. Tippeconnic,

1 Although the Mt. Lemmon Highway clearly needs some improvement, I feel that the reconstruction proposed under the Coronado National Forest Plan will create more problems than it will solve.

Already on holiday weekends, some areas are saturated, so increasing access will only compound the problem. The public is getting used to getting camping permits for National Parks, so why not a similar system here to make sure we can continue to get away from urban woes rather than bring them along on weekend outings? Some permits could be aplied for in advance to accomodate backpackers, large grpups, or others who have to make advance arrangements anyway. The others could be given out on a first-come, first-served basis depending on space availability.

The shuttle system proposed by Rep. Kromko would also alleviate some road traffic--and give drivers who are unsure on mountain roads and/or like to drink an alternative. The widening of lanes, etc. will only increase the Indy 500 instincts of some drivers, especially those full of alcohol. With higher possible speeds, the accident rate does not seem likely to drop.

2 I enjoy hiking the Catalinas, especially the Butterfly Trail, and the Aspen-Draw-Sabino Dawn loop that used to be possible before the ski area expansion. I did enjoy my one day sk'-iing at Mt. Lemmon, but I enjoyed those trails much more--and am aghast at the idea of further expansion of what is a very marginal ski area. Let the yuppies go north!

Especially at this time of year, it's nice to know that we can get away from it all in the Catalinas. Please don't overcrowd them, or make them trendy.

Sincerely,

Laurel M. Cooper

Ms. Laurel M. Cooper

Agency response to Laurel M. Cooper

1. The proposed reconstruction of the General Hitchcock (Mt. Lemmon) Highway is for safety and maintenance needs. The road will be maintained as a scenic highway. It will be reconstructed within the existing alignment and to the existing standard of two lanes with a 30 mph design speed. A separate environmental analysis addressing site specific concerns for the road has been conducted. The analysis indicated use on Mt. Lemmon will not increase significantly due to the planned improvements. Use will increase as the result of population growth in Pima County and the surrounding area. The road is not the means by which to regulate or manage the users of the mountain. The highway is the means to transport all of the people safely to their destinations on the mountain.

   The Forest Service has considered other transportation alternatives for the mountain, and will continue to evaluate these. Neither the Coronado National Forest nor Pima County has the funding necessary to subsidize public transportation on Mt. Lemmon. Any alternative would have to be self supporting. Mt. Lemmon is very different from Sabino Canyon because there are private dwellings on Mt. Lemmon and because the road is a public highway. We do not have the options of closing this road or charging for use as we did in Sabino Canyon. No matter what transportation alternatives become available, the Mt. Lemmon Highway will be needed.

2. New developments at the Mt. Lemmon Ski Area are confined to the existing special use permit area. This allocation to downhill skiing was made approximately ten years ago and the size of the total area under permit has not changed. Total development of the area has been slow over the years because of the marginal economics you have noted. Other uses, such as hiking, within the ski development area will be provided to the extent possible.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 26 1985
RECEIVED

September 23, 1985

Mr. R. B. Tippeconic
Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Az. 85701

0469

Dear Sir:

Here are the Grazing Advisory Board's comments concerning the proposed Coronado National Forest Fifty Year Plan.

We endorse the Forest Service proposed Alternative and our second choice is Alternative "A".

1 We feel that the new statement about the unsatisfactory grazing conditions on the Coronado is far better than the first one. Specifically, that 84% of the land was in satisfactory condition.

2 The board felt that there was a need to clearly and definitely define the term "Riparian", since such areas probably would be closed to grazing. We think that such areas should only be closed to grazing when livestock are obviously causing problems and when there is no other alternative. We don't believe livestock should be denied access to water.

The board thought the plan adequately dealt with fire (its uses and control).

3 We felt off road vehicles should be allowed only on signed roads and that such a road system should be planned and its uses enforced.

4 We felt that fuel wood harvesting should be used as a tool to improve livestock forage and wild life habitat in general. There should be a sufficient charge for the program to be cost effective. This is consistant with the board's feeling that all users of the forest and its products and services should pay a fee.

We didn't think that any changes were necessary in the plan concerning mining.

5 Lastly, the board endorsed the concept of continued grazing in the South Fork of Cave Creek.

Respectfully submitted,

Ben Snure Jr.

Ben Snure, Jr.
Chairman, Forest Advisory Board

Agency response to
Coronado N.F.
Grazing Advisory
Board

1. It has long been recognized that the Coronado's ranges are in a generally acceptable condition. When we speak of "problem allotments", the problem is usually at least partially caused by a lack of proper livestock distribution. This results in overuse of some areas and underuse of others. The result is that, even on our worst ranges, significant acreages are in fair or better range condition. The estimate that 84 percent of the range is in a satisfactory condition is no change from the previous draft, but we are glad to see that you feel that we have stated it more clearly.

   Another point of interest is that a recent reevaluation of the management situation reveals that only 41 problem allotments remain. The statistics in the draft plan are based on a 1980 assessment and they indicate 76 allotments with problems. This rate of progress is quite encouraging, and we appreciate the great permittee cooperation that it reflects.

2. You indicate that you feel that most riparian areas will probably be closed to grazing. Prescriptions in the proposed plan call for exclusion of grazing only in extra sensitive areas; or as a last resort, where range management fails to halt resource degradation. Where riparian protection results in loss of access to water, additional watering facilities will be provided. We believe that a few unique areas and ultra sensitive areas will require exclusion of livestock. Criteria for selecting such areas have been added to the Final Forest Plan in the range management guidelines for Management Area 7.

   Riparian areas are defined in the Forest Plan through the designation and definition of capability area types. Further definitions are found in FSH 2509.23, Riparian Area Handbook.

3. Under the Forest Plan motorized vehicles would be restricted to existing roads that will be maintained as part of the Forest transportation system. Designation of these roads will be by the use of route markers. We estimate it will take three to four years to fully implement this policy.

4. The intent of the Forest Plan is to use fuelwood harvest as a management tool to meet other resource objectives such as improving wildlife habitat and livestock forage. This is in lieu of using other tools such as prescribed fire which would not utilize the wood product. In most cases the charge for the wood product does offset the administration costs, however, the other benefits derived must be considered although there is not a direct monetary value.

5. Several respondents to the Plan have requested that we eliminate grazing from both forks of Cave Creek. To date, we have seen no evidence that well-managed, moderate grazing has been detrimental to these riparian areas. It is important that we recognize the sensitivity of these areas and manage the cattle accordingly.

0397

Phone: (Area Code 505)
548-2247

Bill & Cordy
Cowan

CLOVERDALE CAT[illegible] COMPANY, INC.
CLOVERDALE ROUTE • ANIMAS, NEW MEXICO 88020

September 13, 1985

U. S. Department of Agriculture
Forest Service Division
Forest Supervisor
Coronado National Forest
Federal Building
301 West Congress, FB42
Tucson, Arizona 85701

Dear Sir:

It is my concern for the BUNK ROBINSON PROPOSED WILDERNESS AREA that I am writing.

As a resident of Hidalgo County, New Mexico; a permittee on Coronado National Forest, it is my obligation to reiterate--and want you to know--I am against putting the Bunk Robinson Area into a wilderness area.

There is such a delicate balance of "flora and fauna" in Guadalupe Canyon. By putting it into a wilderness area--calling attention to it by advertising it as a wilderness thereby bringing more people into the area--it will be destroyed. Because it is an isolated area, with natural mountain barriers and land impassable by vehicles, the land is already well protected. Hikers and horsebackers are the only people that can get into the area, at the present time.

There are many possibilities to ruin the area, one such are the poisonous plants now thriving just south of the border, whose seeds can be spread by birds, animals, and humans moving north. Should this happen, there is no way to exercise control on these vile plants, nor control the misery they can cause.

PLEASE VOTE "NO". Thank you.

Sincerely,

Mrs. William R. Cowan

Mrs. William R. Cowan

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 18 1985
RECEIVED

Phone: (Area Code 505)
548-2247

Bill & Cordy
Cowan

0398

CLOVERDALE CATTLE COMPANY, INC.
CLOVERDALE ROUTE • ANIMAS, NEW MEXICO 88020

September 13, 1985

U. S. Department of Agriculture
Forest Service Division
Forest Supervisor
Coronado National Forest
Federal Building
301 West Congress, FB42
Tucson, Arizona 85701

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There are many possibilities to ruin the area, one such are the poisonous plants now thriving just south of the border, whose seeds can be spread by birds, animals, and humans moving north. Should this happen, there is no way to exercise control on these vile plants, nor control the misery they can cause.

PLEASE VOTE "NO". Thank you.

Sincerely,

William R Cowan
William R. Cowan

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 18 1985
RECEIVED

Agency response to
Mr. and Mrs.
William R. Cowan

Control of poisonous plants is possible in wilderness areas, under certain conditions; but greatly complicated by restrictions on the use of mechanized equipment and herbicides. Thank you for pointing out this aspect of the decision to us.

Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by the proposed management of these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and the Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through the management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private lands within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

CORONADO N. F.
OCT 10 '85

0697

Oct. 8, 1985

Dear Bob,

Here are my comments on the proposed plan for the Coronado National Forest. Please place them in the public record.

1 I am not endorsing any of the six alternatives, although my general preference is for Alternative D. Instead, I will try to make my views known on recreation, wilderness and the other resources of the forest.

2 Dispersed recreation in wilderness areas. I do not favor construction or reconstruction of improvements in wilderness areas, except those that would benefit wildlife---like Buster Spring on Pusch Ridge. Trails should be maintained in their present condition. It's a lot better to have people complain about the poor shape of the Pima Canyon trail than to "improve" the trail. I favor public agencies working to provide additional access to wilderness areas and trails like Ventana Canyon, Pima Canyon, etc. The best way to manage a wilderness is to leave it alone; don't try to improve it for the benefit of the user.

3 Dispersed recreation in other forest areas. Recreation trails like the Samaniego and Oracle ridges should be improved. A supertrail ought to be completed around Rose Canyon and Riggs Flat Lakes. Springs should be developed or improved for human and wildlife use. Boilerplate trail signing should be increased. On-the-ground improvements should not be made.

4 Wildlife. The greatest thing the Forest Service can do for wildlife is greatly expand its prescribed burning policy and its newly-discovered policy of letting wildfires burn. I favor buring all of the Coronado National Forest every 10 years, whether by prescribed, natural or manmade fires. Fires clean out the brush and accumulated ground cover and stimulate new vegetative growth. Fires should be allowed to burn their

Cowgill add 1

4 course in wilderness areas. In other areas, fires should be encouraged, except where they would pose a threat to human safety. As mentioned above, additional springs should be developed.

5 Reducing the level of grazing to where it fits the carrying capacity of the range will be a benefit to wildlife. This carrying capacity goal should be accomplished 10 years after the plan becomes final.

6 Off-road vehicle use. As much of the forest as possible should remain open for ORV use. Most of this use is in sandy washes where little damage occurs. I am opposed to a policy that would designate roads that are open. I favor a policy that would designate roads as "closed" where such use has proved detrimental to the land.

7 Inholdings should be acquired.

8 Timber production should be limited to areas of down and dead trees. Fuelwood production should be limited to dead and down trees and to areas where thinning would be (NOT) detrimental to wildlife.

9 Mineral patents should be issued only where an ore body can be proven.

Sincerely yours,

Pete Cowgill

Agency response to
Pete Cowgill

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. In general, we share your philosophy on construction or reconstruction of improvements in wilderness areas. However, some wilderness areas such as Pusch Ridge and Mt. Wrightson are near metropolitan areas and wilderness recreation demands will always be heavy. It sometimes becomes necessary to increase the level of "management" for these areas in order to protect the resources as well as the users and still provide appropriate opportunities.

   Lack of access to the Forest by both trail and road is a Forest-wide problem. We consider it a high priority item. Trailhead access to the Pusch Ridge Wilderness has been a particular problem and much progress has been made in working with Pima County and private landowners. Trailhead parking and access to the Ventana Canyon Trail has been provided by the private landowners in their parking facilities. Additional negotiation is underway to provide separate public trailhead parking. Access to Pima Canyon is currently provided by the trailhead parking on McGee Road. Negotiation is still underway between Pima County and private landowners for access to a new trailhead parking site on National Forest land.

3. No reconstruction of the Samaniego or Oracle Ridge trails is planned. Maintenance will be provided based on available funding and Forest-wide maintenance priorities.

   A trail is planned around Rose Canyon Lake. Although none is now planned around Riggs Flat Lake, it may be desirable in the future.

   We agree springs should be developed and maintained for wildlife use, however, we can not develop them for human use due to requirements for maintaining very high water quality standards. Of course, an exception to this is in areas of developed or concentrated recreation use.

   We agree trail signing should be increased and plan to do so in conjunction with the trail maintenance.

4. While we can not just "let wildfires burn", the Forest Plan would allow us the option of confining fires to specified areas and conditions where they are safe and can be used to meet objectives for wildlife and other re-

Agency response to
Pete Cowgill
(continued)

sources. This applies to all parts of the Forest, including wilderness areas. Actual implementation depends on the specific location and specific burning conditions.

We agree that burning should be done on a regular basis, however, we do not believe it is necessary or even possible to burn the entire Forest every ten years.

5. We agree with you that it will be necessary to temporarily reduce grazing while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the First Period and 338,000 in the Second Period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about 10 percent less than present. Any future increases in livestock numbers will be based on increased capacity.

   While we predict the balance between use and capacity will occur within 20 years, we are optimistic it will occur sooner.

6. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. Approximately 70 percent of the Forest now provides the opportunity for some form of motorized recreation activity. (See Table 21, page 62, DEIS). Before any specific roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements.

   Signing or designation of roads or trails open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads or trails are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is much work yet to be done to sign all roads and trails. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off the road use of vehicles is not acceptable. Direct enforcement of the policy will have to be implemented in stages along with the signing.

7. The Forest planning effort has identified and prioritized private lands within the National Forest that would be suitable for National Forest purposes. Acquisition of these lands through exchange or purchase will be accomplished as opportunities and funding permit.

8. Fuelwood and timber harvest on the Coronado National Forest are activities used to meet other resource objectives such as providing recreational opportunities and providing wildlife habitat. In order to meet these objectives, the harvest of green as well as dead trees is necessary as part of total stand management.

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Agency response to
Pete Cowgill
(continued)

9. Mineral patents are currently issued by the Bureau of Land Management and are based on validity of ore bodies and needs of the mineral developer. The Forest Service is responsible for managing surface resources for those lands retained in public ownership. This management is done within current laws and regulation and is accomplished through the development and approval of mineral operating plans.

0029

I support the alternative for management of the Coronado that maximizes the potential for the public's access to, and enjoyment of the resource.

Recreational access to the forests should be a higher priority than preservation of habitat for wildlife, since whatever forms of wildlife are present, other than lower forms, of no real significance, would be able to tolerate a regulated level of public use.

I also think that whatever sensible use is made of Mt. Graham, particularly, should be able to accommodate the development of the proposed astronomical site(s). They are quiet, and require quiet, and thus would appear to be a very compatible use of a small portion of the mountain's accessible land area.

In short, I oppose any land use plan or alternative that would restrict access to the summit area for astronomical purposes. Beyond that the recreation priorities should supercede any that might tend to accommodate useages primarily aimed at turning a profit, such as grazing, and timber harvest, except where these pursuits actually enhance the sensible management of the resource on the public's behalf.

Rudolph J. Dalpra

Rudolph J. Dalpra
1801 Fargo Drive
Safford, AZ 85546

August 5, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG [illegible] 1985
RECEIVED

Agency response to
Rudolf J. Dalpra

Recreational access to National Forests does not have higher priority than preservation of wildlife habitat. Particularly in the instance of identified rare and endangered species habitat for flora and fauna, specific mitigation measures must be apparent in a proposal, otherwise the proposal can be stopped in court. All access routes to the Coronado that are to be developed will receive site specific analysis as the proposals are developed.

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0491

September 18, 1985

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Arizona 85701

1 After reading the "Summary of the Draft Environmental Impact Statement for the Coronado National Forest Proposed Plan" I recommend Alternative D as listed on page 7 of the draft summary booklet.

2 Also that on a national level, private residences in national forests be curtailed and eliminated altogether in the future.

Respectfully,

G. H. Daniel

G. H. Daniel
707 W. College
Silver City, NM 88061

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 23 1985
RECEIVED

Agency response to
G. H. Daniel

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. The Act of March 4, 1915 established recreation residences as a legitimate use of National Forests. Current Forest Service policy does not allow for establishment of any new residences. Before any private residence or recreation residence located on National Forest land can be removed, the use must be analyzed in relation to other resources needs or uses of the National Forest. This is normally done on a local site basis.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 30 1985

RECEIVED

0725

8121 N. 8th Ave.
Phoenix, AZ 85021
Oct. 19, 1985

Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

I have studied your management proposal for the Coronado National Forest and hereby offer several recommendations for a better balance in favor of conservation as opposed to resource exploitation:

1 1. Not only is wilderness status necessary for **Mt. Graham, Bunk Robinson and Whitmore Canyon,** but the areas of Baker and Guadalupe canyons should be added thereto as they are contiguous with Bunk Rob. The Peloncillo mountains are ecologically rare, harboring an array of basically Mexican plants and animals found nowhere else in the U.S.

2 2. **Mt. Graham** is in danger of being permanently ruined by the construction of a phalanx of observatory edifices controlled by Stewart Observatory. This area is unique in that it is the highest elevation south of the Mogollon Rim and has a fantastic array of flora, fauna and geological conditions not found anywhere else. Just consider: the most perennial streams anywhere in the Coronado Forest; the densest population of black bear anywhere in Western North America; the only spruce-fir forest in the Coronado - need more be said?

Furthermore,a new observatory is a **waste of taxpayers' money** considering that the imminent NASA Space Platform will enable the U.S. to operate large telescopes in orbit without the problems of atmospheric disturbances. The Stewart Observatory is obsolete before it is constructed. My professional background as an aerospace electronics engineer allows me to make this declaration with some authority. Understandably, government astronomers prospectively engageable by the new Stewart won't tell you that.

3 3. **Grazing** is a serious problem not given enough attention in forest management all over the U.S. All grazing should be ended NOW to give areas a chance to rejuvenate themselves. Afterwards, renewed grazing may be reconsidered at much lower levels than is now the case.

4. As a long-time lover of **wildlife** I am dismayed at
the low percentage of wilderness study areas recommended by
4 your plan for actual wilderness. ALL areas under study by
you as well as BLM should be included to adequately protect
this priceless heritage. As our state accomodates ever
growing hordes of new settlers, the increase in hunting and
recreational pressures requires absolutely that these few
areas be protected from destructive commercial
exploitation. Such areas in particular should be better
5 monitored, given Research Natural Area designation and kept
completely out of bounds for grazing and of course
motorized conveyances of any kind. The Arizona Natural
Heritage Program has proposed **Pine/Ramanote** and of course
Ramsey Canyons as RNA's. To these must be added the **high**
cienegas of Mt. Graham, if this area can be spared from
government boondoggling in the first place.

The United States is fortunate in having some forest left worth preserving. Most nations have "developed", poisoned, raped, burned, and killed off most of what was once beautiful in their respective forests (as a former European citizen, I know whereof I speak!). I would hope that we can learn from their mistakes - for our sake and for our successors'.

Sincerely,

Rudolf Dankwort

Agency response to
Rudolf Dankwort

1. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

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The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by the proposed management of these areas.

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Agency response to
Rudolf Dankwort
(continued)

inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private lands within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case with the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

3. We agree that it will be necessary to temporarily reduce grazing, while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the first period and 338,000 in the second period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about 10 percent less than present. We see no justification to end all grazing on the Coronado N.F. as you suggest. Grazing is a legitimate use of National Forest lands as provided in the Multiple Use-Sustained Yield Act of 1960.

4. Most professional wildlife managers do not share your belief that wilderness is best for wildlife. A few wildlife species require relatively undisturbed conditions, but most are quite adaptable to man's activities. When a wilderness designation is placed on an area of land, it limits options for wildlife management. In some cases this results in less animals due to a lack of water or some other critical habitat component.

5. Pine-Ramanote Canyon (Atascosa Mtns.) - We agree these areas need further evaluation and plan to do so with interested parties in the next planning period. Our initial evaluation is that these areas are not highly unique, are highly inaccessible and are not currently threatened by current or anticipated future use. In cases such as this, special designation which calls attention to the area might be more of a threat to unique values because of increased public use. This phenomena has happened in several other special areas and increased activity threatens to destroy the values they were established to protect. Designation is not the answer in all cases and the values of designation and nondesignation must be carefully weighed especially for areas that are remote, protected by physical barriers, or by other designations such as wilderness.

Ramsey Canyon - Although the Nature Conservancy has an excellent facility in the lower portion of Ramsey Canyon, we do not believe the National Forest lands above that merit special area designation, especially since that area is well protected by wilderness designation. Forest Plans are designed to recognize special values and consider them in the management area prescriptions. Special Designations should be reserved for special unique situations where Special Designation status is the only means to provide for the values desired. Currently, the Special Area Designation enjoys a high degree of respect by all Forest users because it has been used wisely and frugally. Generally, both commodity and amenity user groups agree on the desirability of protecting unique values. We believe it is vital to maintain this respected reputation.

Mt. Graham Cienegas - The question of an RNA designation for these cienegas will be addressed in the EIS being prepared for the proposed Mt. Graham Astrophysical Area.

8-5-85

Supervisor Fippeconic, 0038

I have complaints regarding the Stewart Observatory's proposed plans to build an observatory and support facilities atop Mt. Graham. First, the Forest Service should allow a 90 day comment period on the draft EIS for the Mt. Graham area rather than the 45 day comment period that is currently planned. The proposed observatory is far too dubious a project and the problems involved with its construction are far too complex for a 45 day period to suffice. Second, if the observatory is built, its ecological impacts must be greatly reduced from those that would occur under current proposals. For example, the observatory should be closed in winter, lest snowmobilers gain acess to the fragile upper elevation ecosystem due to roads kept open for the observatory. Additionally, no widening of the road up to High Peak should occur, and no construction should be allowed in prime Mt. Graham spruce squirrel habitat, nor along or directly above streams. The Mt. Graham area is a unique, fragile, and spectacular ecosystem which should be preserved in its wild state. Third, it appears that the Stewart Observatory and the Forest Service are seeking to push through plans for the Mt. Graham observatory without adequately assessing its grave ecological consequences and without revealing to the public the harmful effects and enormous costs of the project.

I request that you reject this project and seek to designate all of the Mt. Graham area of the Coronado Nat. Forest as Wilderness. At the very least, please insure adequate environmental assessments and public input. I also request that you inform me of the reasons for doing the Mt. Graham environmental impact statement after th of the rest of Coronado Forest. Is it legal to do split environmental statements for one national forest?

Thank you,
John Davis

Agency response to John Davis

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

Forest planning is an ongoing process. New proposals will be made after a Forest Plan is completed or while under way. Each proposal is analyzed in the context of the Forest as a whole. The environmental analysis may result in publication of an environmental impact statement or it may not depending on significance of the proposal. The Forest Plan is then amended or revised for those portions of the Forest affected by the resulting decision.

The proposed Mt. Graham Astrophysical Area is being addressed in a separate EIS because the timing, significance and controversy did not permit us to adequately address this question in the current Forest Plan EIS. Separate environmental analysis processes are provided for in the planning and other regulations.

0485

Defenders
OF WILDLIFE

September 26, 1985

TO:
R.B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 30 1985
RECEIVED

FROM:
Steve Johnson, Southwest Representative
Defenders of Wildlife
13795 N. Como Drive
Tucson, Arizona 85741

SUBJECT:
Proposed Coronado National Forest Plan

Defenders of Wildlife appreciates this opportunity to comment on the the Coronado Plan. We appreciate the many improvements in this Draft as compared to the September 1982 version. In particular, we applaud the projected period of time required to balance livestock use and capacity being shortened from 50 years to 20 years.

We also appreciate the inclusion of Alternative D into the mix of alternatives available for comment.

1 After devoting as much time as possible to analysis and consultation with other groups and individuals, Defenders of Wildlife supports Alternative D as being the most appropriate for the multiple use mission of the USFS. We also take this opportunity to state our opposition to all development options for the proposed Mt. Graham Astrophysical Site, pending completion of the DEIS on the subject.

GENERAL COMMENTS ON SELECTED AREAS OF THE PLAN:

2 Rural lifestyles are important, and do much to enrich the social fabric of everyone, no matter where they may live. However, the primary mission of the USFS is to maintain the public lands in the best possible condition, and open to the widest possible range of productive uses. The language of the DEIS often sounds as if the USFS is disproportionately concerned with the preservation of the rural lifestyle.

One example of the above tendency is the obvious favoritism shown to the tiny number of ranchers on the Coronado. According to the figures presented on page 58 of the DEIS, livestock provide only 2/10 of one percent of the total jobs and income in the five county area of the Coronado, and only 2 percent of all employment on the forest lands alone.

SOUTHWEST OFFICE: 13795 N. COMO DRIVE, TUCSON, ARIZONA 85741 • (602) 297-1434
NATIONAL OFFICE: 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

3 **RANGE:**
"Based upon past trends, it can be assumed that the demand for permitted use will equal or exceed the capacity in all time periods." (p. 77, DEIS)

According to the latest available information from the National Cattleman's Association, per capita demand for beef in the U.S. has declined by 40 percent in the last five years, from 125 pounds to 75 pounds.

Given the low relative productivity of the arid west even under good conditions, it seem unduly optimistic to plan for grazing to continue as a "...major use of the Coronado" in the future. Increased grazing fees, combined with the vastly increased recreational demands from future population growth in Arizona, will almost certainly add to to the impetus toward a gradual phasing out of the majority of livestock allotments on the Coronado over the next several decades.

4 On p. 102 of the DEIS, it is stated that "...approximately 84% (of the Coronado suitable for grazing) is currently in a satisfactory condition." On p. 77, however, the DEIS states that 76 of the 208 grazing allotments "...exhibit an unsatisfactory management situation." Please explain how both of the above statements could be correct. How can 36.5% of all grazing allotments be unsatisfactory when 84% of all Coronado grazing acreage is satisfactory?

5 On p. 105 of the DEIS, it is stated that "...non-native grasses and forbs will be used for revegetation purposes, when natives do not meet resource objectives." Please explain. If the USFS anticipates that a majority of the resource objectives will require non-native plants, perhaps the resource objectives are inappropriate, and need to be changed. Use of native plants whenever possible is always more beneficial to wildlife, whereas most exotic grasses are not.

RIPARIAN AREAS:

6 It was gratifying to see the emphasis accorded riparian habitat in the DEIS. Defenders of Wildlife would, however, prefer to see more details concerning its management, particularly with respect to protection from cattle. We believe that exclusion through the use of fencing is the only way to ensure that such areas are not overused. Even when salt and water are placed away from riparian areas(in those many areas with intermittent streams), these areas still suffer heavy impacts from livestock seeking shade. No attractant seems capable of preventing movement back to such areas. We request that the Final EIS be very specific about the use of fencing anticipated, location, how much, etc.

7 "The condition of riparian areas will be improved to satisfactory by the end of period 5 in all alternatives."(p. 108,

7 DEIS) Given the productivity of the riparian areas, and the reliance of both livestock and wildlife on such areas, it does not make sense that livestock use and capacity could be balanced by the end of the second period, while the riparian areas will take 50 years to be rated as satisfactory. In any event, 50 years is far too long to wait for such improvements. Please explain the above apparent anomaly.

WILDLIFE:

The DEIS mentions "...partitioning of forage between wildlife and livestock(p. 102), but nowhere is wildlife assigned a percentage of the total available AUM's. In the opinion of Defenders of Wildlife, it is not enough to merely state that the percentage of forage allotted to cattle leaves "plenty" for wildlife. In the Final EIS, please attempt to state a percentage allocated to wildlife, in AUMs, so that comments can be directed more intelligently. Since there are no empty niches in any ecosystem, the amount of AUMs allotted to grazing would presumably have a direct negative correlation with the carrying capacity for wildlife of all kinds. 8

The above statement is supported by the DEIS on p. 102, which states: "The more forage assigned to livestock, the less forage is available to wildlife, yet wildlife needs remain the same." Parenthetically, this quote is interesting in that it does not appear to recognize that wildlife needs can increase, while the need for increased grazing is stated often in the DEIS. It would seem that the fact that "...stocking exceeds capacity by 73,000 AUMs"(DEIS, p.103) is a de facto admission that wildlife numbers have to be depressed as a result of such overstocking. These internal inconsistencies need to be addressed in the Final EIS.

"In summary, the National Forest is an important part of the western outdoor lifestyle enjoyed in southern Arizona and New Mexico. It plays a role in the economic well-being of specific individuals and their families, but it does not play a major economic role in the region's economy.(p. 60, DEIS)

From a strictly direct economic viewpoint, the above statement may be correct. When one considers the impacts of Forest management on the watershed and underground aquifers of southern Arizona, however, I'm not so sure. The long overemphasis on livestock by the USFS, combined with a long history of overgrazing which still continues, makes it likely that the negative influences of cattle will continue to far outweigh their benefit to the surrounding communities.

Defenders of Wildlife appreciates the opportunity to comment on the Proposed Coronado Forest Plan.

Sincerely,

Steve Johnson

Steve Johnson, Southwest Representative

Agency response to Defenders of Wildlife

1. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

2. We agree that part of the mission of the Forest Service is to maintain public land in the best possible condition, and open to widest possible range of productive uses. This has been stated in another way as "maximizing net public benefits." However, part of the USDA and Forest Service mission is to "Contribute to the social and economic well being of people and communities that depend on range for their livelihoods..." (USDA Departmental Regulation, 9500-5, December 15, 1983), and "to contribute to and provide stability of family ranches and farms in areas where there are National Forest System lands." (Forest Service Manual 2202.1).

   We disagree that the Forest Plan is disproportionately concerned with preservation of the rural lifestyle. The figures you cite tend to show that concern for the people and communities dependent on the National Forests is justified. Ranchers using the Forest are few in number and normally account for only a few employees. Incomes are generally low. Therefore, the jobs and income from the livestock industry are insignificant in comparison to tourism and trade sectors which employ large numbers of people. The industry employment figures are representative of the urban/rural conflicts prevalent wherever large metropolitan areas grow up in the midst of traditionally rural areas. We believe that preponderance of numbers is not the only criteria used to determine legitimate use of the Forest. We believe that we can best achieve our mission by trying to integrate the needs of both majority and minority interest into our management. We feel that the Forest Plan best balances these needs without unduely favoring one over another. Grazing is a legitimate use of the Forest and as long as other resource objectives can also be met there is no justification for elimination of grazing from the Forest merely because the users are few in number.

3. The assumption of continued demand for grazing is based on past experience. Presently, there is more demand than supply and we do not expect that demand will diminish during the ten to fifteen year life of the Plan.

   If as you point out grazing were to become economically or politically unviable, demand may decrease at some point in the future. However, there is no evidence that Congress will accelerate grazing fees or remove grazing from our multiple use mission. In fact, the trend in Congress in recent years has been to reduce grazing fees and to emphasize the legitimacy of grazing as a use of the National Forests.

4. We agree that the statements you reference appear to be in conflict and could cause some confusion. However, one reference applies to the condition of the land and the other to the adequacy of management of the livestock which are different things.

   Range condition deals with the health of the range vegetation and soil and the ability of the land to produce stable biotic community. The statement on page 102 of the DEIS shows that 84 percent of the suitable grazing land is in satisfactory biotic condition.

   On the other hand, adequacy of management deals with how the livestock are handled. Typically allotments having unsatisfactory management suffer from significant distribution problems. This is due to the basically lazy nature of the cow. If man does not apply some management technique, the

Agency response to
Defenders of Wildlife
(continued)

cow will choose to stay in the easy terrain near water causing overuse in these areas while the majority of the range goes unused. A satisfactorily managed allotment would have and be following an allotment management plan which would force distribution of the livestock over the entire range. The statement on page 77 shows that 76 allotments have unsatisfactory management. These figures are based on 1980 data. More recent data shows that there are only 41 allotments with unsatisfactory management. We are proud of the rate of improvement and believe that it demonstrates our commitment in the Plan to solve the grazing issue.

5. We do not anticipate that a majority of resource objectives under the Forest Plan will require nonnative plants and that is not what is stated on page 105 of the DEIS. In fact, we will always use native species over nonnative species if native species will accomplish our objectives. The statement on page 105 is talking specifically about revegetation objectives. On some sites which have been denuded by fire or overgrazing, our past experience has shown that native species will not survive and provide effective ground cover. In these cases nonnative species such as orchard grass or Lehman's lovegrass are used to establish ground cover to prevent further erosion.

6. The Forest Plan and EIS are programmatic documents and contain a level of detail consistent with program level direction. There was no intent to do project design or site specific project level analysis. Additional project level analyses will be done to design and implement projects to achieve the objectives of the Forest Plan. The details you have requested for fencing in riparian areas are project design details that are beyond the scope of the Forest Plan and they will be addressed in subsequent project level analyses.

   The standards and guidelines in the Plan provide specific direction on objectives to be achieved in riparian areas. (Draft Plan, pages 45 and 69-71). The Plan has been revised to include criteria for determining when livestock should be totally excluded. These criteria were added to Management Area 7.

7. The lag between balancing grazing use and capacity and the time when 100 percent of the riparian area will be in satisfactory condition is due to the time needed for woody riparian vegetation to recover.

   A riparian area is considered satisfactory when at least 60 percent of the woody plants are in three or more species; three age classes are represented with at least 10 percent in sprouts and seedlings; and at least 60 percent of natural cover is maintained. Since riparian areas that are now unsatisfactory usually are lacking the young age classes of woody vegetation, it will take about 30 years to establish the two younger age classes once grazing is controlled.

   The Forest Plan prescribes that at least 25 percent of the riparian area will be in satisfactory condition by the end of the second period and that the percentage in satisfactory condition will increase each year. The statement that 100 percent will be satisfactory by the end of Period 5 does not mean we will wait until then to make improvements.

8. Standard Forest Service grazing capacity estimation techniques allow for forage allocation to wildlife species present on the range. In cases where livestock use is depressing wildlife populations, additional forage can be allocated to wild animals. We cannot agree that there is a direct correlation between numbers of livestock and capacity for wildlife. Actual dietary overlap between cattle and most wildlife species in Arizona is far from total. For example, in many cases, use of a range by cattle actually enhances production of forage for deer and other browsers through increased availability and productivity of shrubs.

0013

Paradise Star Route
Box 58
San Simon, Az. 85632

Forest Supervisor
Coronado Nat'l Forest
300 West Congress
Tucson, Az. 85701

Dear Sir:

1 First, I received two copies of the Proposed Plan. Please cancel the incorrect address. It cost me 69¢.

2 Second, the only big quarrel I have with the Plan is on page 29, where Transportation System, Roads is discussed. My particular grievance is 3 miles of the 5.5 miles between Portal and Paradise, from the high cattleguard east of the Paradise Cemetary to the cattle guard just north of Portal. This section has been abandoned! We locals have names for the worst areas, like The Tip of the Iceberg, Jay's Stone, Oil Pan Boomer, and the Aswan Dam. No grader has touched it in memory. The county grader works up to these places on east and west ends, but the 3 miles takes major work.

This is a well traveled 5.5 miles. I don't know why you have not received complaints from the rural mail carrier. Can't something be worked out with Cochise County's road workers?

When your personnel comes to the Portal meeting on August 6, ask them to travel this route. Use a nice sedan.

3 Third, why is there not a sign at Paradise? There is a sign on the Portal to Onion Saddle road pointing to Paradise and a sign at the Portal turnoff, and I think also at the Whitetail Canyon-Foothills Road-San Simon intersection, all pointing to Paradise, but nothing here. We live just one block south of the mailboxes and bridge, right on the road, and all non-Cochise County vehicles stop and ask, "Is this Paradise?" Portal's sign is white, green lettering, and says Portal, unincorporated, and the elevation. We need one like it. There are 28 structures in the area, 8 permanent families, and we would like recognition. Again, perhaps County cooperation is needed.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 1 1985
RECEIVED

Sincerely,

Mrs Kitty Deiss

Agency response to Kitty Deiss

1. We have corrected your address.
2. The Coronado National Forest met recently with the Cochise County Commission and County Public Works Engineer to discuss road maintenance on the road between Portal and Paradise. The Forest feels the road should be maintained by the County based on the type of traffic on the road and the fact that a mail carrier uses the route. The County is not interested in assuming maintenance responsibilities because of their limited road maintenance budget. The Forest Service is not a public road agency like the County or State. Therefore, we are only funded to maintain roads to the level appropriate for anticipated Forest use and administration. We will maintain the road to a level which is passable to high clearance vehicles. This level of maintenance does not take user speed or comfort into consideration and does not make a nice road as you have noted.
3. The green sign at Portal is provided by Cochise County. We will be glad to install a standard Forest Service sign that says "Paradise", but can not provide the other information.

C

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2711
LOS ANGELES, CALIFORNIA 90053-2325

0579

September 25, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 7 - 1985

RECEIVED

REPLY TO
ATTENTION OF

Office of the Chief
Environmental Resources Branch

Mr. R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

We have reviewed the Draft Environmental Impact Statement (EIS) and Proposed Forest Plan for the Coronado National Forest, as requested in a letter from your office, dated June 26, 1985.

Our Regulatory Branch will be providing your agency with information regarding permit requirements pursuant to Section 404 of the Clean Water Act. We have no additional comments on the EIS or Proposed Forest Plan; however, we would appreciate the opportunity to review the forthcoming EIS for the Mt. Graham project, which was cited in your June 26, 1985 letter, when it is available.

Thank you for the opportunity to review and comment on this document.

Sincerely,

Carl F. Enson
Chief, Planning Division

Agency response to Department of the Army Corps of Engineers Environmental Resources Branch	We look forward to any comments you may have once the Mt. Graham Astrophysical draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document.

0670

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2711
LOS ANGELES, CALIFORNIA 90053-2325

October 8, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

REPLY TO
ATTENTION OF

Regulatory Branch

U.S. Department of Agriculture
Forest Service
Coronado National Forest
FB #42
300 West Congress
Tucson, Arizona 85701

Gentlemen:

Reference is made to your Draft EIS, Proposed Coronado National Forest Plan, dated May 1985.

Although our Planning Division is coordinating a District-wide comment on your DEIS we would like to take this opportunity to call to your attention Army Corps of Engineers' jurisdiction that may affect some aspects of your operation of the Coronado National Forest. A Corps of Engineers permit is required for the discharge of dredged or fill material into "waters of the United States" pursuant to Section 404 of the Clean Water Act.

The definition of "waters of the United States" is quite lengthy, but effectively includes all water bodies, waterways, and wetlands in the United States with an interstate commerce connection.

The term "discharge of dredged or fill material" includes, without limitations, groins, breakwaters, road fills, beach nourishment, riprap, jetties, grading and land clearing (where the topography of the wetland or water bottom is raised), land fills, and disposal of material excavated from waters of the United States.

Rivers, creeks, streams and their impoundments in Coronado National Forest are considered waters of the United States. Activities as described above in these waters may require an Army permit. There is, however, a nationwide permit that authorizes the discharge of dredged or fill material into (1) waters of the United States above the headwaters (the point on the waterway where the flow becomes less than 5 cubic feet per second) or (2) isolated waters not part of a surface tributary system to interstate waters or navigable waters of the United States. This nationwide permit authorizes the discharge of dredged or fill materials into such waters providing that that discharge does not cause the loss of substantial adverse modification of 1 acre or more of waters of the United States. Please find enclosed a copy of our regulations (with recent revisions incorporated). This nationwide permit may be found at 33 CFR 330.5(a)(26).

In order to determine if a permit would be required for any proposed discharge please contact Sharon Kautto or Glenn Lukos of our Regulatory Branch at (213) 894-5606.

Sincerely,

Michael A. Grebinski
Acting Chief, Construction-
Operations Division

Enclosure

PART 330—NATIONWIDE PERMITS

Sec.
330.1 General.
330.2 Definitions.
330.3 Nationwide permits for activities occuring before certain dates.
330.4 Nationwide permits for discharges into certain waters.
330.5 Nationwide permits for specific activities.
330.6 Management practices.
330.7 Discretionary authority.
330.8 Expiration of nationwide permits.

Authority: 33 U.S.C. 403; 33 U.S.C. 1344.

§ 330.1 General.

The purpose of this regulation is to describe the Department of the Army's nationwide permit program and to list all current nationwide permits which have been issued by publication herein. The two types of general permits are referred to as "nationwide permits" and "regional permits." A nationwide permit is a form of general permit which authorizes a category of activities throughout the nation. The authority for general permits to be issued by district engineers on a regional basis is contained in 33 CFR Part 325. Copies of regional permits can be obtained from the appropriate district engineer. Nationwide permits are designed to allow the work to occur with little, if any, delay or paperwork. However, the nationwide permits are valid only if the conditions applicable to the nationwide permits are met. Just because a condition cannot be met does not necessarily mean the activity cannot be authorized but rather that the activity will have to be authorized by an individual or regional permit. Additionally, division engineers have the discretion, under situations and procedures described herein, to override the nationwide permit coverage and require an individual or regional permit. The nationwide permits are issued to satisfy the requirements of both Section 10 of the River and Harbor Act of 1899 and Section 404 of the Clean Water Act unless otherwise stated. These nationwide permits apply only to Department of the Army regulatory programs (other Federal agency, state and local authorizations may be required for the activity).

§ 330.2 Definitions.

(a) The definitions of 33 CFR Parts 321–329 are applicable to the terms used in this part.

(b) Discretionary authority means the authority delegated to division engineers in § 330.7 of this Part to override provisions of nationwide permits to add regional conditions or to require individual permit applications.

§ 330.3 Nationwide permits for activities occurring before certain dates.

The following activities are permitted by a nationwide permit which was issued on 19 July 1977 and need not be further permitted:

(a) Discharges of dredged or fill material in waters of the United States outside the limits of navigable waters of the United States that occurred before the phase-in dates which began July 25, 1975, and extended Section 404 jurisdiction to *all* waters of the United States. These phase-in dates are: after July 25, 1975, discharges into navigable waters of the United States and adjacent wetlands; after September 1, 1976, discharges into navigable waters of the United States and their primary tributaries, including adjacent wetlands, and into natural lakes, greater than 5 acres in surface area; and after July 1, 1977, discharges into all waters of the United States.

(b) Structures or work completed before 18 December 1968 or in waterbodies over which the District Engineer was not asserting jurisdiction at the time the activity occurred provided, in both instances, there is no interference with navigation.

§ 330.4 Public notice.

(a) *Chief of Engineers.* Upon proposed issuance of new nationwide permits, modification to, or reissuance of, existing nationwide permits, the Chief of Engineers will publish a notice in the Federal Register seeking public comments and including the opportunity for a public hearing. This notice will state the availability of information, at the Office of the Chief of Engineers and at all district offices, which reveals the Corps' provisional determination that the proposed activities comply with the requirements for issuance under general permit authority. The Chief of Engineers will prepare this information which will be supplemented, if appropriate, by division engineers.

(b) *District engineers.* Concurrent with publication in the Federal Register of new or reissued nationwide permits by the Chief of Engineers, district engineers will so notify the interested public within the district by an appropriate notice. The notice will include any applicable regional conditions adopted by the division engineer.

§ 330.5 Nationwide permits.

(a) *Authorized activities.* The following activities, including discharges of dredged or fill material, are hereby permitted provided the conditions listed in paragraph (b) of this section and the notification procedures, where required, of § 330.7 are met. *Comment.* Because some states have denied water quality certification/coastal zone consistency for some nationwide permits reissued herein and many states have granted conditional water quality certification, applicants should check with the district engineer regarding eligibility under the nationwide permits.

(1) The placement of aids to navigation and regulatory markers which are approved by and installed in accordance with the requirements of the U.S. Coast Guard (33 CFR Part 66, Subchapter C).

(2) Structures constructed in artificial canals within principally residential developments where the connection of the canal to a navigable water of the United States has been previously authorized (see 33 CFR 322.4(g)).

(3) The repair, rehabilitation, or replacement of any previously authorized, currently serviceable, structure or fill or of any currently serviceable structure or fill constructed prior to the requirement for authorization; provided such repair, rehabilitation, or replacement does not result in a deviation [1] from the plans of the original structure or fill, and further provided that the structure or fill to be maintained has not been put to uses differing from uses specified for it in any permit authorizing its original construction. Maintenance dredging is not authorized by this nationwide permit.

(4) Fish and wildlife harvesting devices and activities such as pound nets, crab traps, eel pots, lobster traps, duck blinds, clam and oyster digging.

(5) Staff gages, tide gages, water recording devices, water quality testing and improvement devices, and similar scientific structures.

(6) Survey activities including core sampling, seismic exploratory operations, and plugging of seismic shot holes and other exploratory-type bore holes.

(7) Outfall structures and associated intake structures where the effluent from that outfall has been permitted under the National Pollutant Discharge Elimination System program (section 402 of the Clean Water Act) (see 40 CFR Part 122) provided that the district or division engineer makes a determination that the individual and cumulative adverse environmental effects of the structure itself are minimal in accordance with §§ 330.7 (c)(2) and (d). Intake structures *per se* are not included—only those directly associated

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[1] Minor deviations due to changes in materials or construction techniques and which are necessary to make repair, rehabilitation, or replacement are permitted.

with an outfall structure are covered by this nationwide permit.

(8) Structures for the exploration, production, and transport of oil, gas, and minerals on the outer continental shelf within areas leased for such purposes by the Department of Interior, Bureau of Land Management, provided those structures are not placed within the limits of any designated shipping safety fairway or traffic separation scheme (where such limits have not been designated or where changes are anticipated, District Engineers will consider recommending the discretionary authority provided by § 330.7 of this Part), and further subject to the provisions of the fairway regulations in 33 CFR 209.135.

(9) Structures placed within anchorage or fleeting areas to facilitate moorage of vessels where such areas have been established by the US Coast Guard.

(10) Non-commercial, single-boat, mooring buoys.

(11) Temporary buoys and markers placed for recreational use such as water skiing and boat racing provided that the buoy or marker is removed within 30 days after its use has been discontinued. At Corps of Engineers reservoirs, the reservoir manager must approve each buoy or marker individually.

(12) Discharge of material for backfill or bedding for utility lines including outfall and intake structures provided there is no change in preconstruction bottom contours (excess material must be removed to an upland disposal area). A "utility line" is defined as any pipe or pipeline for the transportation of any gaseous, liquid, liquifiable, or slurry substance, for any purpose, and any cable, line, or wire for the transmission for any purpose of electrical energy, telephone and telegraph messages, and radio and television communication. (The utility line and outfall and intake structures will require a Section 10 permit if in navigable waters of the United States. See 33 CFR Part 322. See also paragraph (a)(7) of this section.)

(13) Bank stabilization activities provided:

(i) The bank stabilization activity is less than 500 feet in length;

(ii) The activity is necessary for erosion prevention;

(iii) The activity is limited to less than an average of one cubic yard per running foot placed along the bank within waters of the United States;

(iv) No material is placed in excess of the minimum needed for erosion protection;

(v) No material is placed in any wetland area;

(vi) No material is placed in any location or in any manner so as to impair surface water flow into or out of any wetland area;

(vii) Only clean material free of waste metal products, organic materials, unsightly debris, etc. is used; and

(viii) The activity is a single and complete project.

(14) Minor road crossing fills including all attendant features both temporary and permanent that are part of a single and complete project for crossing of a non-tidal waterbody, provided that the crossing is culverted, bridged or otherwise designed to prevent the restriction of and to withstand expected high flows [4] and provided further that discharges into any wetlands adjacent to the waterbody do not extend beyond 100 feet on either side of the ordinary high water mark of that waterbody. A "minor road crossing fill" is defined as a crossing that involves the discharge of less than 200 cubic yards of fill material below the plane of ordinary high water. The crossing will require a permit from the US Coast Guard if located in navigable waters of the United States (see 33 U.S.C. 301). Some road fills may be eligible for an exemption from the need for a Section 404 permit altogether (see 33 CFR 323.4).

(15) Fill placed incidental to the construction of bridges across navigable waters of the United States including cofferdams, abutments, foundation seals, piers, and temporary construction and access fills provided such fill has been authorized by the US Coast Guard under Section 9 of the River and Harbor Act of 1899 as part of the bridge permit. Causeways and approach fills are not included in this nationwide permit and will require an individual or regional Section 404 permit.

(16) Return water [5] from a contained dredged material disposal area provided the State has issued a certification under Section 401 of the Clean Water Act (see 33 CFR 325.2(b)(1)). The dredging itself requires a Section 10 permit if located in navigable waters of the United States.

(17) Fills associated with small hydropower projects at existing reservoirs where the project which includes the fill is licensed by the Federal Energy Regulatory Commission under the Federal Power Act of 1920, as amended; has a total generating capacity of not more than 1500 kw (2,000 horsepower); qualifies for the short-form licensing procedures of the Federal Energy Regulatory Commission (see 18 CFR 4.61); and the district or division engineer makes a determination that the individual and cumulative adverse effects on the environment are minimal in accordance with §§ 330.7 (c)(2) and (d);

(18) Discharges of dredged or fill material into waters of the United States that do not exceed ten cubic yards as part of a single and complete project provided no material is placed in wetlands [6] [7]

(19) Dredging of no more than ten cubic yards from navigable waters of the United States as part of a single and complete project.[6]

(20) Structures, work and discharges for the containment and cleanup of oil and hazardous substances which are subject to the National Oil and Hazardous Substances Pollution Contingency Plan provided the Regional Response Team which is activated under the Plan concurs with the proposed containment and cleanup action.

(21) Structures, work, and discharges associated with surface coal mining activities provided they are authorized by the Department of the Interior, Office of Surface Mining, or by states with approved programs under Title V of the Surface Mining Control and Reclamation Act of 1977; the appropriate district engineer is given the opportunity to review the Title V permit application and all relevant Office of Surface Mining or state (as the case may be) documentation prior to any decision on that application; and the district or division engineer makes a determination that the individual and cumulative adverse effects on the environment from such structures, work, or discharges are minimal in accordance with §§ 330.7 (c)(2) and (3) and (d).

(22) Minor work or temporary structures required for the removal of wrecked, abandoned, or disabled vessels or the removal of obstructions to navigation.

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[4] District Engineers are authorized, where regional conditions indicate the need, to define the term "expected high flows" for the purpose of establishing applicability of this nationwide permit.

[5] The return water or runoff from a contained disposal area is administratively defined as a discharge of dredged material by 33 CFR 323.2(j) even though the disposal itself occurs on the upland and thus does not require a Section 404 permit. This nationwide permit satisfies the technical requirement for a Section 404 for the return water where the quality of the return water is controlled by the state through the Section 401 certification procedures.

[6] These nationwide permits are designed for very minor dredge and fill activities such as the removal of a small shoal in a boat slip; they cannot be used for piecemeal dredge and fill activities.

[7] The State of Wisconsin has denied water quality certifications pursuant to Section 401 of the Clean Water Act for these two nationwide permits. Consequently, the permits do not apply in Wisconsin.

(23) Activities, work, and discharges undertaken, assisted, authorized, regulated, funded, or financed, in whole or in part, by another federal agency or department where that agency or department has determined, pursuant to the CEQ Regulation for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Part 1500 *et seq.*), that the activity, work, or discharge is categorically excluded from environmental documentation because it is included within a category of actions which neither individually nor cumulatively have a significant effect on the human environment, and the Office of the Chief of Engineers (ATTN: DAEN–CWO–N) has been furnished notice of the agency's or department's application for the categorical exclusion and concurs with that determination. Prior to approval for purposes of this nationwide permit of any agency's categorical exclusions, the Chief of Engineers will solicit comments through publication in the Federal Register.

(24) Any activity permitted by a state administering its own permit program for the discharge of dredged or fill material authorized at 33 U.S.C. 1344(g)-(1) shall be permitted pursuant to Section 10 of the River and Harbor Act of 1899 (33 U.S.C. Part 403). Those activities which do not involve a Section 404 state permit are not included in this nationwide permit but many will be exempted by Sec. 154 of Pub. L. 94–587. (See 33 CFR 322.2(a)(2)).

(25) Discharge of concrete into tightly sealed forms or cells where the concrete is used as a structural member which would not otherwise be subject to Clean Water Act jurisdiction.

(26) Discharges of dredged or fill material into the waters listed in paragraphs (a)(26) (i) and (ii) of this section except those which cause the loss or substantial adverse modification of 10 acres or more of waters of the United States, including wetlands. For discharges which cause the loss or substantial adverse modification of 1 to 10 acres of such waters, including wetlands, notification of the district engineer is required in accordance with § 330.7 of this section.

(i) Non-tidal rivers, streams, and their lakes and impoundments, including adjacent wetlands, that are located above the headwaters.

(ii) Other non-tidal waters of the United States, including adjacent wetlands, that are not part of a surface tributary system to interstate waters or navigable waters of the United States (i.e., isolated waters).

(b) *Conditions.* The following special conditions must be followed in order for the nationwide permits identified in paragraph (a) of this section to be valid:

(1) That any discharge of dredged or fill material will not occur in the proximity of a public water supply intake;

(2) That any discharge of dredged or fill material will not occur in areas of concentrated shellfish production unless the discharge is directly related to a shellfish harvesting activity authorized by paragraph (a)(4) of this section.

(3) That the activity will not jeopardize a threatened or endangered species as identified under the Endangered Species Act, or destroy or adversely modify the critical habitat of such species. In the case of Federal agencies, it is the agencies' responsibility to review its activities to determine if the action "may affect" any listed species or critical habitat. If so, the Federal agency must consult with the Fish and Wildlife Service and/or National Marine Fisheries Service;

(4) That the activity will not significantly disrupt the movement of those species of aquatic life indigenous to the waterbody (unless the primary purpose of the fill is to impound water);

(5) That any discharge of dredged or fill material will consist of suitable material free from toxic pollutants (See Section 307 of Clean Water Act) in toxic amounts;

(6) That any structure or fill authorized will be properly maintained;

(7) That the activity will not occur in a component of the National Wild and Scenic River System; and

(8) That the activity will not cause an unacceptable interference with navigation.

(9) That the best management practices listed in § 330.6 of this Part should be followed to the maximum extent practicable.

(c) *Grandfathering.* (1) Discharges previously authorized by the nationwide permits (§ 330.4(a) (1) and (2) of the July 22, 1982, Interim Final Regulation) modified and reissued at § 330.5(a)(26) continue to be authorized by those nationwide permits for 18 months from the effective date of this regulation if:

(i) The discharge was commenced or under contract to commence by the effective date of this regulation *or*

(ii) The permittee had

(A) By March 29, 1984, received written confirmation from the Corps stating that the Corps considered the specific discharge in question and determined it was previously authorized by the nationwide permits modified and reissued at § 330.5(a)(26) *and*

(B) By the effective date of this regulation, obtained all necessary pre-discharge approvals or permits required by federal, state or local laws or regulations.

(2) Permittees discharging under paragraph (c)(1) of this section must provide documents demonstrating compliance to the district engineer within 60 days of the effective date of this regulation, These documents will become a part of the public record. The district engineer will notify such permittees whether they meet the criteria of paragraph (c)(1) of this section within 15 days of receipt of such documents.

(3) If a permittee cannot meet the criteria of § 330.5(c)(1), but can otherwise demonstrate to the district engineer within 60 days of the effective date of this regulation investments made toward the discharge in reliance on the previous authorizations of the nationwide permits modified and reissued at § 330.5(a)(26) which cannot be modified to comply with 33 CFR Parts 320–330 without substantial loss to the permittee, then the district engineer may allow the discharge to proceed for 18 months from the effective date of this regulation if and when he determines the discharge complies with the section 404(b)(1) guidelines.

(4) After 18 months from the effective date of this regulation, the permittee must follow 33 CFR Parts 320–330 for any new or remaining discharges.

(5) This section shall not set aside, alter, prevent or affect any past, present, or future assertion of the division engineer's authority to require an individual permit under either § 330.7 of the July 22, 1982, Interim Final Regulation (47 FR 31794) or § 330.8 of this part.

§ 330.6 Management practices.

(a) In addition to the conditions specified in §§ 330.4 and 330.5 of this Part, the following management practices should be followed, to the maximum extent practicable, in the discharge of dredged or fill material under nationwide permits in order to minimize the adverse effects of these discharges on the aquatic environment. Failure to comply with these practices may be cause for the district engineer to recommend or the division engineer to take discretionary authority to regulate the activity on an individual or regional basis pursuant to § 330.7 of this Part.

(1) Discharges of dredged or fill material into waters of the United States shall be avoided or minimized through the use of other practical alternatives.

(2) Discharges in spawning areas during spawning seasons shall be avoided.

(3) Discharges shall not restrict or impede the movement of aquatic species indigenous to the waters or the passage of normal or expected high flows or cause the relocation of the water (unless the primary purpose of the fill is to impound waters).

(4) If the discharge creates an impoundment of water, adverse impacts on the aquatic system caused by the accelerated passage of water and/or the restriction of its flow, shall be minimized.

(5) Discharge in wetlands areas shall be avoided.

(6) Heavy equipment working in wetlands shall be placed on mats.

(7) Discharges into breeding areas for migratory waterfowl shall be avoided.

(8) All temporary fills shall be removed in their entirety.

§ 330.7 Notification procedures.

(a) The general permittee shall not begin discharges requiring pre-discharge notification pursuant to the nationwide permit at § 330.5(a)(26):

(1) Until notified by the district engineer that the work may proceed under the nationwide permit with any special conditions imposed by the district or division engineer; or

(2) If notified by the district or division engineer that an individual permit may be required; or

(3) Unless 20 days have passed from receipt of the notification by the district engineer and no notice has been received from the district or division engineer.

(b) Notification pursuant to the nationwide permit at § 330.5(a)(26) must be in writing and include the information listed below. Notification is not an admission that the proposed work would result in more than minimal impacts to waters of the United States; it simply allows the district or division engineer to evaluate specific activities for compliance with general permit criteria.

(1) Name, address, and phone number of the general permittee;

(2) Location of the planned work;

(3) Brief description of the proposed work, its purpose, and the approximate size of the waters, including wetlands, which would be lost or substantially adversely modified as a result of the work; and

(4) Any specific information required by the nationwide permit and any other information that the permittee believes is appropriate.

(c) *District engineer review of notification.* Upon receipt of notification, the district engineer will promptly review the general permittee's notification to determine which of the following procedures should be followed:

(1) If the nationwide permit at § 330.5(a)(26) is involved and the district engineer determines either: (i) The proposed activity falls within a class of discharges or will occur in a category of waters which has been previously identified by the Regional Administrator, Environmental Protection Agency; the Regional Director, Fish and Wildlife Service; the Regional Director, National Marine Fisheries Service; or the heads of the appropriate state natural resource agencies as being of particular interest to those agencies; or (ii) the particular discharge has not been previously identified but he believes it may be of importance to those agencies, he will promptly forward the notification to the division engineer and the head and appropriate staff officials of those agencies to afford those agencies an adequate opportunity before such discharge occurs to consider such notification and express their views, if any, to the district engineer concerning whether individual permits should be required.

(2) If the nationwide permits §§ 330.5(a) (7), (17), or (21) are involved and the Environmental Protection Agency, the Fish and Wildlife Service, the National Marine Fisheries Service or the appropriate state natural resource or water quality agencies forward concerns to the district engineer, he will forward those concerns to the division engineer together with a statement of the factors pertinent to a determination of the environmental effects of the proposed discharges, including those set forth in the 404(b)(1) guidelines, and his views on the specific points raised by those agencies.

(3) If the nationwide permit at § 330.5(a)(21) is involved the district engineer will give notice to the Environmental Protection Agency and the appropriate state water quality agency. This notice will include as a minimum the information required by paragraph (b) of this section.

(d) *Division engineer review of notification.* The division engineer will review all notifications referred to him in accordance with paragraph (c)(1) or (c)(2) of this section. The division engineer will require an individual permit when he determines that an activity does not comply with the terms or conditions of a nationwide permit or does not meet the definition of a general permit (see 33 CFR 322.2(f) and 323.2(n)) including discharges under the nationwide permit at § 330.5(a)(26) which have more than minimal adverse environmental effects on the aquatic environment when viewed either cumulatively or separately. In reaching his decision, he will review factors pertinent to a determination of the environmental effects of the proposed discharge, including those set forth in the 404(b)(1) guidelines, and will give full consideration to the views, if any, of the federal and state natural resource agencies identified in paragraph (c) of this section. If the division engineer decides that an individual permit is not required, and a federal or appropriate state natural resource agency has indicated in writing that an activity may result in more than minimal adverse environmental impacts, he will prepare a written statement, available to the

§ 330.8 Discretionary authority.

Except as provided in paragraph (d) of this section, division engineers on their own initiative or upon recommendation of a district engineer are authorized to modify nationwide permits by adding regional conditions or to override nationwide permits by requiring individual permit applications on a case-by-case basis. Discretionary authority will be based on concerns for the aquatic environment as expressed in the guidelines published by EPA pursuant to section 404(b)(1). (40 CFR Part 230)

(a) *Regional conditions.* Division engineers are authorized to modify nationwide permits by adding conditions applicable to certain activities or specific geographic areas within their divisions. In developing regional conditions, division and district engineers will follow standard permit processing procedures as prescribed in 33 CFR Part 325 applying the evaluation criteria of 33 CFR Part 320 and appropriate parts of 33 CFR Parts 321, 322, 323, and 324. A copy of the Statement of Findings will be forwarded to the Office of the Chief of Engineers, ATTN: DAEN–CWO–N. Division and district engineers will take appropriate measures to inform the public at large of the additional conditions.

(b) *Individual permits.* In nationwide permit cases where additional regional conditioning may not be sufficient or where there is not sufficient time to develop regional conditions under paragraph (a) of this section, the division engineer may require individual permit applications on a case-by-case basis. Where time is of the essence, the district engineer may telephonically recommend that the division engineer assert discretionary authority to require an individual permit application for a specific activity. If the division engineer concurs, he may verbally authorize the district engineer to implement that authority. Both actions will be followed by written confirmation with copy to the Chief of Engineers (DAEN-CWO-N). Additionally, after notice and opportunity for public hearing, division engineers may recommend to the Chief of Engineers that individual permit applications be required for categories of activities, or in a specific geographic area. The division engineer will announce the decision to persons affected by the action. The district engineer will then regulate the activity or activities by processing an application(s) for individual permit(s) pursuant to 33 CFR Part 325.

(c) Discretionary authority which has been exercised under nationwide permits issued on 19 July 1977 expires four months from the effective date of this regulation. Such authority may be extended or reinstated after appropriate procedures of this regulation and 33 CFR Parts 320 through 325 have been followed.

(d) For the nationwide permit found at § 330.5(a)(26), after the applicable provisions of § 330.7(a) (1) and (3) have been satisfied, the permittee's right to proceed under the general permit may be modified, suspended, or revoked only in accordance with the procedure set forth in 33 CFR 325.7.

§ 330.9 Expiration of nationwide permits.

The Chief of Engineers will review nationwide permits at least every five years. Based on this review, which will include public notice and opportunity for public hearing through publication in the Federal Register, he will either modify, reissue (extend) or revoke the permits. If a nationwide permit is not modified or reissued within five years of publication in the Federal Register, it automatically expires and becomes null and void.

Agency response to Department of the Army Corps of Engineers Regulatory Branch	Thank you for calling our attention to the requirements for discharge permits and providing us with a copy of the latest regulations. All Coronado National Forest activities will meet requirements of the Clean Water Act.

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9 Oct. 1985

Clark H. Derdeyn
1023 Sahuaro Dr.
Sierra Vista, AZ 85635

CORONADO N. F.

OCT 11 '85

[illegible]	[illegible]	Action X	Action X
FS	NES	LA	O
LMP	BAF	ARCH	N
AO	PER	WL	SV
ENGR	AS	WS	S
RGE	CS	SLS	SC
RLT	LX	DISP	NANTC
FIRE	RECP	PIO/IS	COMM

R. B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress St.
Tucson, AZ 85701

Comments on Forest Plan

There have been habitat improvements on much of the western Federal Lands due to the implementation of the Taylor Grazing Act in 1934: however, "The amount of good and excellen range has not changed much since the first range assessment in 1935,--"(Thadis W. Box, 1977. The Past, Present, and Future of Grazing on Public Lands. Rangeman's Journal 4(6), Dec. 1977, page 168). The failure to increase the amount of land in the better condition classes indicates that new land management laws and , procedures are now needed. The planning of 50 years of future based on pastlaws and procedures will not bring the land to it's fullest potential. Surely we owe our children's children our best efforts. In other words, more efforts directed toward determining alternative land management procedures and options are needed before commiting time to planning a future based on less than adequate past procedures. Changes are necessary and the Federal Natural resource specialists should plan the directions of these changes rather than try to implement changes developed by people not trained in natural resource management.

Some of the greatest faults in the present system are in the grazing allotment system. For example:

Rex D. Pieper and Gary B. Donart found that during drought years on southwestern ranges herbage production was reduced by about 75 percent (Drought and Southwestern range vegetation. Rangeman's Journal. 2(6), Dec. 1975. pages 176-178). Thirty years of weather records for Fort Huachuca, Ariz. indicate 15 years of below normal rainfall, five years within the normal range (14.5-16.5 inches of rainfall), and ten years of above normal rainfall. Two drought years in a row normally occur (56 & 57, 59 & 60, 62 & 63, 68 & 69, 72 & 73,75 & 76, and 80 & 81); therefore, the present inflexable stocking rates will not allow much if any habitat condition improvement.

An animal unit month (AUM) on low productivity land is not worth near as much as an AUM on high productivity land; therefore inflexability in prcing an AUM of grazing is not fair to the allotment holder.

There is no real incentive within the present system to make habitat condition improvement attractive (economically feasable)to the allotment holder.

Many of the more desirable improvements planned seem to be tied into manpower and budget increases. At the national debt level we now have this is not realistic; therefore, alternative techniques to accomplish sound natural resource goals should be included. Much has been written in the press about an AUM of grazing costing $2.36 more than the fee colledted. This coupled with the above more than indicates that a new procedure is needed.

Alot of the grazing allotment holders have degrees in some natural reaource area, are interested in staying on the land, and are interested in the total environment of the land. Prehaps it is now time to experiment with having some allotment holders become more or less paid natural resource managers for the U.S. Forest SErvice. One way this could be done would be to reduce the livestock allotment to 50 percent of the current level, allow 25 percent of the current allotment to be grazed at no charge, charge 60 percent of the current AUM price (for similar land) on the additional stock up to the above amount(Using this portion of the allotment would not be mandatory), and develop a program to pay the allotment holder for approved improvements to the habitat (labor + materials). Eash five years the habitat would be evaluated. If the capacity is increased the allotment would be increased with the same payment conditions. If the capacity decreased the allotment would be reduced and full payment rather than 60 percent charged. If the allotment's capacity decreased a second time the allotment holder would be removed from the experimental program. The second time an allotment increased it's capacity the allotment would be raised to 60 percent of the new capacity (25 percent at no charge and 35 percent at 60 percent charge). Ten percent increases for improvement of the capacity would also be earned for each of the next 10 year periods (with no change in the payment conditions above). Some form of annual payment should also be made to the allotment holders for improvements in wildlife habitat on his allotment. In addition, they could be paid to collect some recreational use data on their allotment.

The Ariz. GAme and Fish Dept's. Big Game Strategic Plans for 1980-1985 (page 22) shows thatthe U.S. Forest Service controlls the management of 5,076,480 acres of Ariz's white-tailed deer habitat (73 percent of the total white-tailed deer habitat in Arizona) and that an average of one deer is harvested for each 2,778 acres of habitat. The 24,600 acres of white=tailed deer habitat on Fort Huachuca cannot be uniquely different in natural productivity, but a deer is harvested for each 269 acres (10.3 times more per area). Del WAkimoto"s 1972 study (An Economic Analysis of Resident Firearms Deer Hunting In Arizona) found a value of $17.08 per section (640 acres) for deer hunting and $138.70 per section for agriculture. If the ARizona white-tailed dder harvest was increased 10.3 times the dollar value of firearms deer hunting would be $175.92 per section. This increased harvest would produce about one million pounds of excellent quality red meat from the white-tailed deer harvest on the U.S. Forest Service's part of the habitat. Fifty to 100 years from now the production of this much red meat at a low expendature of energy will probably be significant; therefore, increased management effort should be applied to the wildlife on these lands.

Agency response to Clark H. Derdeyn

Thank you for your comments on the proposed Coronado National Forest Plan. Many citizens are beginning to advocate some significant changes in the administration and management of the federal rangelands. Many such changes would require legislative action and are outside the scope of the current planning process.

Although recent studies may indicate the amount of good and excellent rangeland has not changed much since 1935 for much of the western Federal lands, this is not necessarily true for lands administered by the Coronado National Forest. Significant improvements in range conditions have been made since the early 1900's when the U.S. Forest Service assumed management of the lands. This improvement has been made under current laws and regulation. We agree that some changes in laws or policy would be helpful to the natural resource managers, but these changes are not absolutely necessary to achieve improvements to the land. We must continue to plan for improved conditions as in the proposed Forest Plan.

We are familiar with the paper by Professor's Piper and Donart to which you refer. Other studies also indicate that drought is the rule rather than the exception in the Southwest. For this reason, we attempt to stock ranges below the average potential so that no harm will be done to the ecosystem in drought years. When a drought of unusual magnitude (more than the two years that you mention) occurs it will be necessary to reduce stocking further.

You offer some interesting ideas for creating incentives for ranchers to improve the condition of their grazing allotments. Whether they are viable or not is beyond the scope of our present consideration. We believe that incentives already exist for those ranchers seriously interested in ranching as a business. Increases or decreases in numbers of livestock are directly related to the capacity of the land to support the animals. This in turn is directly related to the management job performed by the ranchers. This incentive is being intensified by the increased interest of the public regarding livestock grazing on public lands.

We acknowledge that much of the whitetailed deer habitat is found on National Forest System lands, especially within the Coronado National Forest. Most of it is already in good to excellent condition and our management direction will maintain or improve these conditions. Future opportunities to increase deer harvest, as you suggest, will be available if the decision is to do this. As you are aware, the State Game and Fish Departments are responsible for determining harvest levels of deer or other wildlife.

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Oct. 9, 1985
P.O. Box 384
Tularosa N.M. 88352

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

Robert Tippeconnic, Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

Dear Sir;

I have read the proposed management plan for the Coronado National Forest and have the following comments. In my opinion, none of the proposed actions and alternatives for the Land and Resource Management Plan are acceptable. All statements of action approach the management of the resource as if it were a commodity from which a profit will be made. I do not believe this is the mandate under which the Forest Service was designed to operate, but if it is the entire National Forest System is a failure. 1

I believe that the general direction which the Forest Service has taken is incorrect. The Forest Service should not be attempting to manipulate 2

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a natural resource for the benefit of a few individuals in special interest groups such as the livestock and timber industries. Rather the resource should be allowed to follow the natural ecological process which was the case for millinia before the Forest Service began its current "management" practices. The Forest Service should focus its efforts on managing the people who abuse the forest resource for their own profit, always at the expense of the American taxpayer. I believe that this course of action would result in an optimum benefit to all of the American people for whome you hold the forest in trust. 2

An example of a group that requires closer regulation is the livestock producers who use forest lands. The members of this industry abuse the forest lands by overstocking and overgrazing, a practice which has been documented, and addmitted to in current Forest Service Draft Environmental Impact Statement (DEIS). The effects are wide spread, long lasting, and always detrimental. Effects from this abuse of the forest include stripping grasslands, compacted soils, heavy ~~runnoff~~, flooding, excessive devistating erosion, siltation of streams, riparian zone devestation, water quality deprivation, and stream flow reduction due to water shed inability to retain water.

Because of livestock abuse in the past the Forest Service is working to eleminate the Pinyon-Juniper (P-J) successional stage which is the result of previous overgrazing. Once you have controled the P-J and grass is returned, livestock producers can overstock and overgraze once again. According to the projections stated in the DEIS, there is no apparent deviation from previous practices by the livestock producers- with permission and acquiescence from the Forest Service. The resource cannot 3 withstand this self-perpetuating attitude toward environmental management. 3

The timber industry also abuses the forest resource by irresponsible practices such as unrestricted road building (payed for by taxpayers through a complicated credit system between loggers and the Forest Service), steep slope Timber harvest, and clear cutting, all contributing to deficate sales and adverse impacts upon fisheries resources, including: 4

a. increased erosion and sedimentation with loss of habitat and smothering of aquatic organisms;

b. increased frequency and magnitude of flooding with loss of fish and devestation of channel stability;

c. stream obstruction by logging debris;

d. increased stream temperature;

e. increased wind damage to riparian vegetation following removal of protective cover (Sullivan, C.R. 1985. Editorial. Fisheries A Bullitin of the American Fisheries Society. Vol.10, NO5).

Off-the-road vehicle enthusiast who insist upon being allowed to drive their vehicles "any where" (as the sales advertisements show) are equally damaging. Their contribution to abuse of the forest would include air and noise pollution, tearing-up grasslands and wildflowers, digging rutts which will turn to gullies after heavy rains, and chasing wildlife for the "sport". 5

Petro-chemical and mineral companies who demand the right to explore for new sources on forest lands, many times in fragile and sensative areas, when there are world surpluces of their products. 6 There is presently an oil glut world wide. At present production rates Saudi Arabia, with the single largest pool of known oil reserves, can continue producing for near 100 years. The american petro-chemical industry alone has the true facts about how many oil wells are capable of producing but for what ever reason are capped and being withheld from inventory and production.

All of the above are examples of problems precipitated by people and need to be addressed in a manner which will solve (eliminate) people problems.

It would not be acceptable to criticize proposed plans without offering alternative courses of action.

7 If the Forest Service is going to consider the National Forest as a commodity for sale, the very least you should do is charge a realistic price (at least break-even) for the consumption of that publicly owned resource. With money either saved or gained, the Forest Service would be able to fund more regulatory personnel to keep the abuse by people to a minimum. Additionally

it could assure that the harvest of that resource is accomplished by the most up-to-date ecologically sesitive methods. The Forest Service is not now receiving adequate compensation; the livestock producers are the example.

1974 - The Forest Service was charging $\$1.^{\underline{11}}$ per AUM while the BLM was charging $\$1.^{\underline{06}}$ per AUM.

1978 - The two agencies began charging a uniform rate.

1980 - The rate charged rose to $\$2.^{\underline{30}}$ per AUM.

1982 - The rate charged DECLINED to $\$1.^{\underline{86}}$ per AUM as a result of fees being set according to a formula specified in the Public Rangeland Improvement Act.

1983 - The situation became ludicrus when the Forest Service was charging \$1.^{40} per AUM. At that time livestock producers were paying \$8.^{83} per AUM for grazing rights on private lands. Concurrently the Department of Defense was charging \$7-\$11 per AUM through the use of competative bidding.

1985- The current charge is in the neighborhood of \$1.^{35} per AUM.

Interestingly an AUM has a value of about \$12.^{00} when it is put into the economic model for analysis. What are the intangable benefits received by the American taxpayer by this bit of mathematical hocus-pocus? Because 8 agency costs for operating grazing programs increase with inflation and far exceeds income from grazing receipts, taxpayers in 1982, paid a subsidy of nearly \$14 per animal grazed on public lands- an average of more than \$2,100.^{00} per permittee. Livestock grazing on forest lands in the Western States is a burden on the American taxpayer. Is increased livestock grazing the best use of the forest resource over the longest period of time for the broadest spectrum of the public? NO! 9

From an economic and/or esthetic point of view, the forest would best be managed for wildlife. According to reports of the U.S. Forest Service, the waters of our National Forest System support about 16,000,000 fisherman days per year. When we combine this figure with the value of a fisherman day as determined by the U.S. Fish and Wildlife Service, we find that the approximate annual value of Forest Service fisheries resources is $475 million. One way to view this figure is to consider it as the annual "interest" income on the value of the fisheries resource. If we "earn 10% on our money" then the resource is worth $4.75 billion

20.9 14

to society. If we add aesthetic value, the figure goes much higher (Sullivan, 1985).

My recommended alternatives would include (but not be limited to); 1) charging realistic dollar value for the consumptive use (radical depletion of the resource) of forest resources - possibly a good method would be competative 10

bidding; 2) dramatically reduce the densities of livestock using the forest resource to a level well below the calculated carrying capacity - this should allow the resource to 11

begin restoration; 3) initiate a program of exclusion of all livestock from A) riparian zones, wilderness areas, and enviromentaly fragile areas, B) public recreation areas such as 12

picnic and camping areas; 4) enthusiastic and vigerous enforcement of ALL laws regulating the activities of ANY group using the forest resources. 13

The livestock producers are not the

only economically and politically powerful group of consumptive users which should have the previously stated regulations applied to their activities.

The other groups which should be included in a program of realistic charges for use and/or reduction of activities, are the timber industry, petro-chemical and mineral exploration companies, and off-the-road vehicles individuals and clubs. There may be other abusive users of the forest resource, however, those specified are likely the most potentially devastating groups.

The Forest Service must, by Congressional mandate, legislation, and other "agreements" manage the National Forest to include grazing, logging, recreation, and pest control (which is probably a result of forest mis-management in the first place). However, the implementation of these activities on the National Forest brings to mind some questions which need more clarification in the proposed management plan.

1) Are there more ecologically sound methods of controlling forest pests than deficit timber harvest? 14

2) Is a substantial increase in timber harvest necessary to control insect pests? 15

3) What are the effects of livestock grazing and increased timber harvest on population size and habitat depletion of endangered species? 16

4) Will extensive nutrient analysis be done on soils before timber harvest - to insure that adequate nutrients will remain after harvest for regeneration of new trees? If there are not adequate remaining nutrients, can the forest resource be considered "renewable"? 17

5) With deficit spending occuring at all levels of government, how is a substantial increase in deficit 18

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timber sales justified? 18

6) From an economic point of view, isn't it more justifiable to manage more for wildlife than for livestock and timber? 19

7) In the Steward Observatory development (which is ecologically unsound) truely necessary - considering the fact of the new super telescope to be placed in ordit by the shuttle next year? 20

There are some things which I am in favor of;

1) Greatly increased wilderness areas. 21

2) Forest Service gaining right-of-way accross all private lands to forest lands which are not currently accessable to the public. 22

3) General public using the forest being allowed to pay access and users fee which would allow the public equal status with commercial users. 23

4) Permit fee increase for personal fuel/wood harvest - greatly increased fee charges for 24

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commercial/~~food~~ fuel/ wood harvest- vigerous enforcement of rigid fuel/wood harvest regulations. 24

By continuing with the present course of action, or any of the stated alternatives in the Land and Resource Management Plan, the Forest Service does nothing to mitigate, reduce, or eliminate the litany of nightmare effects which result from continued irresponsible stewardship of the great natural resource of the National Forest. Be inovative, consider the forest natural resource first, not the inadequate small amount of money now being received!

Gabriel A Desmare

G.A. Desmare
P.O. Box 384
Tularosa NM 88352

Agency response to
G. A. Desmare

1. We disagree with your assessment of National Forest management.

   The National Forest System is mandated by Congress to develop and administer the renewable surface resources of the National Forests for multiple use and sustained yield of the several products and services obtained therefrom.

   This basic mission is, therefore, one of conservation and wise use of available resources. This is necessary to sustain productivity of the land to keep future resource opportunities open.

   All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. Mr. Desmare infers throughout his letter that the Forest Service should not subsidize Forest users "at the expense of the American taxpayer." He sites several examples throughout the response but primarily focuses on the livestock grazing industry. We offer Mr. Desmare the following response in an effort to clarify the subsidy issue.

   As a matter of principle, we do not believe that it is appropriate to single out Forest Service range permittees or any other interest group as being the sole recipients of a federal "subsidy." Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid by that individual to enjoy those benefits. Another way of expressing this would be to view it as an income or wealth transfer. This kind of income redistribution does not necessarily involve the actual transfer of cash. For example, in the case of a recreation user who pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full actual cost of providing that benefit. Since the source of the Forest Service recreation management funds is the public treasury, it could be said that all recreation users on the National Forest are being subsidized. Viewed from this perspective, almost all of the use and enjoyment derived from the Coronado National Forest could be considered to be a subsidy. This kind of subsidy would include virtually all developed recreation use, dispersed recreation use, skiers, bird watchers, wilderness users, hunters and fishermen, all downstream water users who benefit from watershed management, private property owners who benefit from Forest Service fire protection programs, range permittees, firewood users, anyone who uses a

Agency response to
G. A. Desmare
(continued)

Forest Service road, etc. The potential list of Forest users who could be considered to be the recipients of a subsidy or income transfer is practically endless. Under the existing rules of our society, the public sector provides many such subsidies which touch the lives of all citizens. The ultimate decision of who receives a subsidy and who pays, rests with the elected representatives of the people; in other words, it is a political decision. The U.S. Forest Service, as custodians of public trust lands, operates under authorities granted by the U.S. Congress and is not empowered to make the ultimate decision of who is subsidized and who pays. In summary, the subsidy issue which you raise is indeed a critical issue. However, it should be remembered that range permittees are but one among many National Forest users who receive benefits in excess of the costs necessary to produce and distribute those benefits.

3. Based on the proposed Forest Plan very little of the pinyon-juniper ecosystem would be converted to grassland. Table 60, DEIS estimates this change to total 650 acres or less than one percent of the pinyon-juniper type. This would occur in areas where the woody species have invaded natural grasslands.

   The commitment of the Forest Plan to balance livestock use with capacity and to get all allotments under proper management does not support your contention of continued overgrazing.

4. Timber harvest under the Forest Plan is done to enhance recreation, scenic, and wildlife values. Maintenance of healthy stands of trees is essential to maintaining those values now and in the future. The silvicultural methods proposed for harvest call for establishing and maintaining a diversity of age classes, including mature and overmature trees up to 240 years. A diversity of tree densities is also prescribed. Standards and guidelines are shown in the management prescription for Management Area 2 in the Forest Plan. The acres (13,729) determined to be suitable for timber harvest on the Coronado National Forest represent only 12 percent of the total coniferous forest type. No cable logging is included in the suitable timber land base. This management direction does not support your contention of adverse impacts to fisheries resources.

5. The Coronado Forest Plan proposes to restrict motor vehicle use to existing roads and trails on 76 percent of the Forest. On the other 24 percent (wilderness and research natural areas) no motor vehicle use would occur. This change is to prevent the potential impacts to resources that you note.

6. Forest Service policy toward mineral activity on National Forest System lands is implicit in law.

   All minerals on the public land, except those specifically subjected to other disposal by Congress, are subject to appropriation by the location of mining claims. The 1872 Mining Law was a grant by Congress of the right for individuals to go on the vacant, unappropriated public land to search for, disclose, appropriate, produce, and process the minerals. It was a grant also of the right to use surface and surface resources necessary to those operations and of reasonable access to them. The grant is limited only in that unnecessary or unreasonable activities are not authorized.

   Sales of common materials are made under the authority of the Materials Act of 1947, as amended (Material Act). Leases are made under the authority of the Mineral Leasing Act of 1920, the Leasing Act for Acquired Lands of 1947, the President's Reorganization Plan No. 3 of 1946, the Geothermal Steam Act of 1970, and the Coal Leasing Amendments Act of 1975 (Leasing Laws), most of which have been amended one or more times.

   Three other laws have major relevance to the Forest Service function relative to minerals and the effects of mineral activity. The Mining and Mineral Policy Act of 1970 (MMPA) provides a National policy which must guide the Forest Service. The Federal Land Policy and Management Act of

Agency response to
G. A. Desmare
(continued)

1976 (FLPMA) provides for an information base for locations under the 1872 Act and defines the basis for removing Federal land from mineral activity.

The Wilderness Act of 1964 limits the application of the Mining Law and the Leasing Laws, and in certain situations reduces the rights accorded to those operating under the Mining Law.

Minerals are fundamental to the Nation's well-being. The National Forest System by coincidence of geology and geography is a principal storehouse of minerals and energy. The search for an removal of minerals and energy resources are authorized uses of the National Forest System, to be encouraged and facilitated in accordance with the National Mining and Mineral Policy Act of 1970 and conducted in the public interest.

The Forest Service objective is to carry out the mineral management mission in a fair and timely manner, consistent with multiple-use management principles, to integrate the exploration, development, and removal of mineral and energy resources with the use and conservation of other resources. The Forest Service will, through appropriate regulations and plans of operation, seek to minimize adverse impacts to other resources while fulfilling our mandate to foster mineral development.

7. See response number 2.

8. See response number 2.

9. See response number 2.

10. Fees for timber and fuelwood harvest are constantly reviewed and adjusted based on local costs and selling values of the products. Competitive bidding is used for commercial sales.

    Livestock grazing fees are set by Congress.

    Fees for mineral resources are set by the Administration under existing laws and regulations.

11. We agree that it will be necessary to temporarily reduce grazing, while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the first period and 338,000 in the second period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about 10 percent less than present. We see no justification to "dramatically reduce" grazing on the Coronado N.F. as you suggest.

12. We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing.

    We see no justification to exclude all livestock from all wilderness areas. The Wilderness Act itself permits livestock grazing within levels to protect wilderness values.

    Livestock grazing levels have been and will continue to be adjusted based on biological capacity and needs of other resource uses.

    Livestock grazing has been eliminated from most developed recreation sites. Light seasonal grazing may be permitted to reduce fire hazard from grasses.

Agency response to
G. A. Desmare
(continued)

13. Law enforcement is one of the many tools used to manage all resource uses on the Coronado National Forest. The proposed Forest Plan provides for an increased effort in law enforcement although it is difficult to reach a balance in the distribution of people and money to do all the jobs involved in managing a National Forest.

14. The National Forest System manages forest pests through Integrated Pest Management as defined here.

Integrated pest management - A process for selecting strategies to regulate forest pests in which all aspects of a pest-host system are studied and weighed. The information considered in selecting appropriate strategies includes the impact of the unregulated pest population on various resource values, alternative regulatory tactics and strategies, and benefit/cost estimates for these alternative strategies. Regulatory strategies are based on sound silvicultural practices and ecology of the pest-host system and consist of a combination of tactics such as timber stand improvement plus selective use of pesticides. A basic principle in the choice of strategy is that it be ecologically compatible or acceptable.

15. The Coronado National Forest Plan does not propose a substantial increase in timber harvest to control insect pests.

16. The effects of all resource activities, including livestock grazing and timber harvest, on endangered species is discussed in Chapter 4, DEIS. Table 52, page 100, summarizes these combined effects.

17. Soil surveys are conducted as part of the process for determining which lands are suitable for sustained timber harvest. An analysis of site productivity is included. Nutrients are constantly used and replaced as the timber stands grow.

18. The Coronado National Forest does not plan substantial increases in timber sales. The number of sales and level of harvest for sawtimber will remain at or near present levels. See Table 18, page 36, Draft Forest Plan.

19. The Coronado National Forest Plan does provide for managing wildlife habitat in conjunction with other resources, such as livestock and timber. The Forest is already blessed with many kinds of wildlife and the proposed management will sustain and in many cases increase these levels.

20. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

21. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

Agency response to G. A. Desmare (continued)

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

22. We agree that access to public lands of the Coronado National Forest is a critical problem and the proposed Forest Plan calls for a very significant increase in right-of-way acquisition. In order to achieve the goal of reasonable access to all parts of the Forest, we must count on the cooperation of other Federal, State, and County Agencies as well as private landowners who have an interest in road management and access. We feel acquisition of rights-of-way across private lands within the Forest boundary is primarily our responsibility, while access to the Forest boundary should be a shared responsibility of Federal, State, and County Agencies.

Agency response to G. A. Desmare (continued)	We are willing--even anxious--to work with other agencies to acquire needed public access. The unique "Islands in the Desert" nature of the Coronado National Forest sets it apart from other forests in the National Forest System. The scattered ownership pattern due to the isolated mountain ranges in this area results in a real challenge to satisfy the need for public access. As noted above, we must count on the cooperation of all to meet that challenge.
	23. We have no authority to initiate a general user access fee for National Forest lands. Only Congress has the authority to develop regulations of this kind.
	24. Fees for personal and commercial fuelwood harvest are constantly reviewed and adjusted taking into account local costs and selling values.

5361 North Post Trail
Tucson, Arizona 85715

0608

October 8, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 9 - 1985
RECEIVED

R. B. Tippiconic
Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Arizona 85701

Dear Tipp:

The Proposed Plan and EIS is certainly well prepared and shows
enormous effort -- complies with legal requirements and standards--
consistently proposes traditional policy and organization-- appears
to be within the framework of regional and national planning guides and
direction, goals / recommended levels and rates for projected targets
(RPA) . Unfortunately this leaves me (the reader) a bit frustrated
with the lack of unique management situations and solutions for
the Coronado. One feels the plan could apply anywhere -- and all
1 too often that the resulting effects of alternatives in management
are not all that significantly different either in the first 10 years
or the next 50 years on either the community (people) or the
resource (national forest).

2 Although not 100% satisfied with any one alternative, I personally
would vote for and support Alternative B because in my opinion
there is no need for the Mt. Graham astrophysical facility. It would
be repititous of many existing ground observatories, and will become
outdated with each new rocket space probe. I also feel that the
3 continuing study of additional wilderness in Arizona is not in
the public interest --especially the 62,000 acres on Mt. Graham.

In general the Plan's system of mapping and classifying management
areas with appropriate prescriptions, monitoring intervals, cost
estimates is understandable -- but perhaps too broad and vague.
For example 87% of the Forest is in area 4 and9, and its difficult
4 to visualize how you manage black bear habitat with little or no
population, trend, or kill data? or rate mineral development potentials
for week-end prospectors? or manage all wilderness lightning fires
as prescribed burns? At least on the drought June day with 110 degree
heat, 4% humidity, and 40 MPH winds you may not do it often !

I was disappointed that the "Issues, Concerns, and Opportunities"
5 sections did not emphasize the impact of air pollutions (acid rain
and smog) on forest vegetation. If smelters and auto emissions
remain unchecked,all future priorities of vegetation manipulation
could completely change. Since future plan revisions seems complicated,
I suggest more review and evaluation between Districts in their
6 prioity scheduling for recreation site construction, land ownership
adjustments, rights of way and transportation developments, office
and facility construction, etc.

Finally, I disagree with the proposed rebuilding of Hitchcock Highway.
7 Visually drastic and costly upgrading will only increase speed,
accidents and traffic congestion.

Sincerely,

Clyde W. Doran

Agency response to Clyde W. Doran

1. We hope that "the lack of unique management situations and solutions for the Coronado" reflects our belief that past management of the Forest has been headed in the correct direction. As a result, drastic changes are not reflected in this Forest Plan. Direction to resolving critical management issues is reinforced by the Forest Plan. Alternatives presented give resource management choices within the total capability of the Forest. Because the Forest resource capabilities are limited and changes come slowly, there are not "significant" differences between alternatives or differences over time.

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in an separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

3. In response to several public comments on our DEIS, the Forest Plan was changed to recommend the entire 62,000 acre Mt. Graham Wilderness Study Area as Wilderness. When a new plan is prepared in ten to fifteen years, any areas that are essentially roadless will be considered for their wilderness suitability along with other resource uses as per the National Forest Management Act.

4. The prescriptions for each of the management areas contain specific practices, standards and guidelines for managing all resource uses appropriate to that area. These practices, standards and guidelines were developed based on knowledge and analysis of the types of information and data you refer to (black bears, mineral potential, and ability to manage lightning fires as prescribed fires in wilderness.) This base information is contained in other documents and is only summarized as needed in the Plan or EIS.

5. The issues, concerns, and opportunities presented in the Plan and EIS are those the Forest has the direct ability to deal with. The impact of air pollution on forest vegetation is a concern to management. However, the solution to the problem is national, if not international, in scope. The Forest Plan can not deal directly with this issue except to monitor the effects.

6. The Forest will continuously review, and if necessary, amend priorities for the things you suggest. Any changes would be based on needs and opportunities to meet overall Forest resource goals and objectives.

7. The proposed reconstruction of the General Hitchcock (Mt. Lemmon) Highway is for safety and maintenance needs. The road will be maintained as a scenic highway. It will be reconstructed within the existing alignment and to the existing standard of two lanes with a 30 MPH design speed. A separate environmental analysis addressing site specific concerns for the road has been conducted. The analysis indicated use on Mt. Lemmon will not increase significantly due to the planned improvements. Use will increase as the result of population growth in Pima County and the surrounding area. The road is not the means by which to regulate or manage the users of the mountain. The highway is the means to transport all of the people safely to their destinations on the mountain.

   The Forest Service has considered other transportation alternatives for the mountain, and will continue to evaluate these. Neither the Coronado National Forest nor Pima County has the funding necessary to subsidize public transportation on Mt. Lemmon. Any alternative would have to be self supporting. Mt. Lemmon is very different from Sabino Canyon because

Agency response to
Clyde W. Doran
(continued)

there are private dwellings on Mt. Lemmon and because the road is a public highway. We do not have the options of closing this road or charging for use as we did in Sabino Canyon. No matter what transportation alternatives become available, the Mt. Lemmon Highway will be needed.

0713

1260 E. Allen St
Tucson, Az. 85719
October 10, 1985

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Az. 85701

CORONADO N.F.
OCT 11 '85

Action X Info ✓	Init	Action X Info ✓	Init
FS		REG	
LMP		SAF	
AO		PER	
ENGR		AS	
RGE		CO	
RLT		LK	
FIRE		RECP	

I wish to respond in regards to EIS #03-05-85-1 and proposed plan in regards to Coronado National Forest management. Having lived and enjoyed the wonderful outdoors of Arizona for 30 years, I wish to express my concerned opinion towards future public land use.

Present and future population growth places a greater need for recreational opportunities on the available resources. It becomes increasingly important that we utilize these lands wisely to offer adequate room for relaxation and enjoyment. Special use areas such as wilderness, WSA's, and RNA's demand an exorbitant proportion of land as contrasted to their beneficial use. Already, 20 percent of this Forest Service land is classified as wilderness and a large proportion of other areas such as National Parks and BLM wilderness areas exist. I strongly believe in using the public land for the most good for the most people. Therefore I do not believe that additional land should be placed in wilderness classification thereby limiting its use unnecessarily.

Additionally, I believe that dispersed recreational use offers the best opportunity for a large segment to experience the outdoors or "wilderness" in a manner that most prefer. This segment includes hikers, birdwatchers, hunters, four wheelers, rockhounds, etc. to whom neither designated campgrounds nor wilderness areas are suitable. Indeed, it is this middle ground, or multiple use management land that should be predominant to allow adequate low density dispersed recreational use. Most established campgrounds have become over-restricted, overcrowded and overregimented.

Thus, primitive roads such as old mining trails, logging roads, etc serve as a good means for dispersing recreationalists for a more meaningful and enjoyable outdoor experience. I therefore strongly urge the retention and non-closure of primitive roads and jeep trails as a valuable aid to this need.

I therefore express the view that Forest Service land should be retained in multiple use management status offering the maximum benefit for all. Please, no more wilderness areas!

Sincerely, Raleigh M Drake

Agency response to Raleigh M. Drake

We agree that the overall demand for recreational opportunities will continue to increase. Wilderness is one of the multiple resources that must be considered along with other resources and uses. We believe the Forest Plan gives the best balance of all recreational uses given all of the constraints to be considered. Maintaining an adequate transportation system to accommodate all types of users is part of the Forest Plan.

0691

Earth First!

Earth First! Wilderness Proposal for Peloncillo Mountains

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 9 - 1985
RECEIVED

In recognition of the unique beauty, biological wealth, and inherent value of the Peloncillo Mountains in their wild state, Earth First! hereby proposes that the entire Forest Service portion of the Peloncillos plus adjacent Bureau of Land Management portions of the Peloncillos in Arizona and New Mexico be added to the National Wilderness Preservation System. We propose that all of the Peloncillos be preserved forever as Wilderness with no further developments and with elimination of those few developments currently within the Peloncillos. (See accompanying map for appropriate Wilderness boundaries.) We suggest that the new 120,000-acre Peloncillo Wilderness be named the Geronimo Wilderness in commemoration of the noble Indian leader who fought so bravely here 100 years ago. We also call upon the Forest Service, Bureau of Land Management, and Arizona and New Mexico Departments of Fish and Game to cooperate in establishing a wildlife reintroduction program for the Geronimo Wilderness. Among species which once inhabited this region and should now be reintroduced are: jaguarundi, jaguar, Mexican wolf, ocelot, thick-billed parrot, and grizzly bear. (The Montana Dept. of Fish, Wildlife, and Parks is now seeking to give away grizzlies, so these will be easy to obtain.) Already, the Peloncillos are internationally known for their rare species; a strong reintroduction program would make the Peloncillos biologically rich to a degree even greater than that of other US Wilderness Areas.

The specific changes within the Peloncillos which will be necessary for protection as Wilderness are relatively minor: The road in the South Deer Creek area, the Forest Service route known as the Geronimo Trail, the short section of road leading south from Rt. 63 in the southern Peloncillos, and the

P.O. Box 5871 • Tucson Arizona • 85703 • 602-622-1371

2 short sections of road near the Spring of Contention should all be closed. Permanent artificial structures within the Geronimo Wilderness should be removed. However, inability to attain any of these objectives should not prevent establishment of all of the Peloncillos as Wilderness.

Among the many geographical, biological, archaelogical, and aesthetic reasons for preservation of the Peloncillos as Wilderness are the following:

1. Many of the Çanyon bottoms in the Pelloncillos have soils of the Glendale-Arizona complex which enable sturdy root systems up to 5 feet deep, thereby allowing a grassland habitat excellent for wild animals but too fragile for heavy livestock grazing.

2. Rocks 25 million years old are spectacularly displayed in Peloncillo canyon walls.

3. Mineral surveys have not found mineral wealth, the presence of which has been used in other areas as a justification (albeit a bad one) for release from Wilderness consideration. Energy potential is also lacking.

4. The incredible diversity of vegetation ranges from Chihuahuan desert scrub and mesquite grassland to mixed conifer and oak-pine woods. Peloncillo canyons contain lush riparian habitat with unique mixtures of hardwoods.

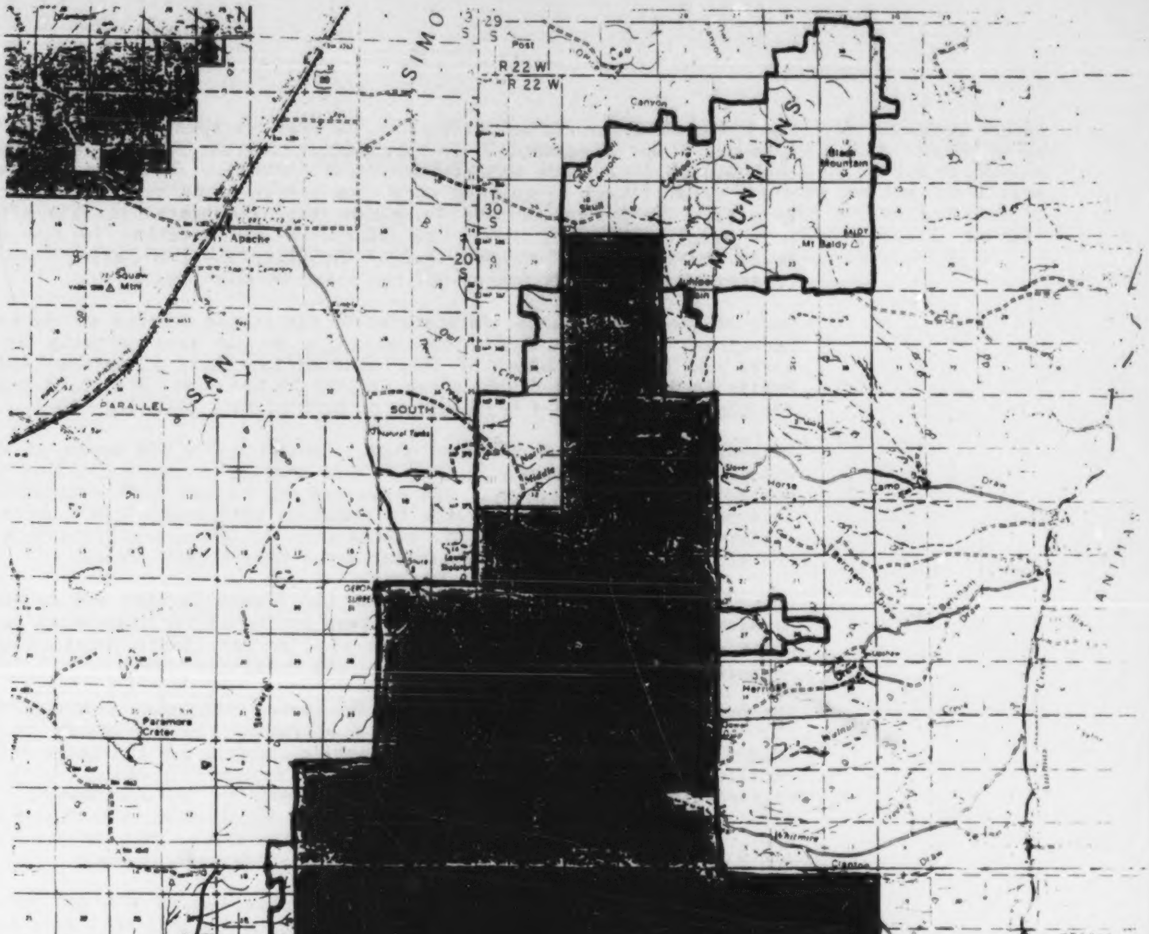
5. The Peloncillos supported native peoples for 20,000 years, dating back at least to the Cochise Culture, followed by various agricultural and nomadic peoples and eventually inhabited by Apaches. Some of the works of these peoples may still be seen at a number of sites in the Peloncillos, all of which need greater protection from vandals.

6. The Peloncillos have also supported a wealth of species. Among the many rare animals still found in the Peloncillos are: Coue's whitetail deer, coatimundi, mountain lion, bobcat, pronghorn, Sonora topminnow, Gila monster, giant spotted whiptail, Sonoran mountain kingsnake, Sonoran coachwhip, Colorado river toad, coppery-tailed trogon, white-sided jackrabbit, spotted bat, southern yellow bat, zone-tailed hawk, Mexican

turkey, violet-crowned hummingbird, broad-billed hummingbird, Bell's vireo, beardless flycatcher, varied bunting, Gila woodpecker, buff-collared nightjar, Lucifer hummingbird, and thick-billed kingbird. Many of these species are endangered or threatened and the last 3 nest nowhere else in the US. Among noteworthy plant species are the Mexican pinyon and Chihuahua Pine, as well as 2 endangered species -- *Castilleja cruenata* and *Vacquelina pauciflora*.

7. The Peloncillos offer splendid hiking yet they have received so little use up to now that most of the region -- including watersheds such as Whitmire, Dutchman, and Hog Canyons -- looks almost untouched by humans. Walking to the summit of 6256-foot Peloncillo Peak, hikers see one of the grandest views in the Southwest. The Bunk Robinson Peak and Whitmire Canyon roadless areas may be among the wildest portions of southern Arizona and New Mexico.

In sum, the Peloncillo Mountains are one of the wildest, most biologically rich, most beautiful, and unique mountain ranges in the US. As such, the Peloncillos merit maximum protection, which can only be insured through designation as Wilderness. Establishment of the Geronimo Wilderness in 1986 would be a fitting way to commemorate the 100th anniversary of Geronomo's courageous surrender.



SAN SIMON
MOUNTAINS
PARALLEL
SOUTH
Apache
Squaw Mtn
Paramore Crater
Canyon
Skull
Black Mountain
Mt Baldy
Horse
Camp
Draw
ANIMAS
ARIZONA
NEW MEX
Guadalupe
CORNER
T 29 S
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R 31 E
R 32 E
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E
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Agency response to Earth First!

The responsibility for reintroduction of wildlife species rests with the State Game and Fish Departments, or sometimes, the U.S. Fish and Wildlife Service. When suitable habitats on National Forest land are available for reintroduction, we will work closely to encourage the involved agencies to provide the animals. The Bureau of Land Management also cooperates in this effort. The only species currently under consideration for stocking in the Peloncillo Mountains are desert bighorn sheep. In fact, the New Mexico Game and Fish Department has already introduced the sheep in some areas.

Most of the public lands administered by the Forest Service and Bureau of Land Management within the Peloncillo Mountains do not meet criteria for roadless areas and therefore have not been studied for their wilderness suitability. Public lands totaling 37,757 acres (28,800 FS and 8,957 BLM) have been studied for possible wilderness designation as part of this planning effort.

Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

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Agency response to Earth First! (continued)	The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

0609

4611 - 2nd. ave. N.E.
Seattle, WA 98105

5 October 1985

R.B. Tippeconnic, Supervisor
Coronado National Forest
300 W. Congress St.
Tucson, AZ 85701

CORONADO N. F.
OCT 10 '85

Dear Mr. Tippeconnic,

This letter is my comment on the proposed Forest Plan and its draft E.I.S. for the Coronado National Forest. I am a professional biologist, educator, and member of the Board of Directors of the Washington Native Plant Society. I have traveled extensively in and studied the flora and fauna of southeastern arizona, and I have an active interest in the management of our National Forests in general and the Coronado in particular.

While your approach to forest management is professional and, to a certain extent, well balanced, I would like to point out several specific problems I see in the draft proposals and recommend changes that would make the final Plan more responsive to the need to protect our priceless natural heritage, as represented by the lands of the Coronado. I would also like to offer my support for those portions of the draft documents that I believe are particularly fine.

1 In general terms, I find Alternative D to be far preferable to the proposed action (P.A.) alternative. Its response to the increasing need for wilderness lands preservation, Research Natural area needs, and ecmonic efficiency in forest management make alternative D the most reasonable and well-balanced of the developed alternatives.

2 The major weakness in the P.A. is that it is highly biased against the need to preserve the remaining wilderness lands on public property to assure adaquate wild lands resources and opportunities for the future. While the draft documents admit the ever-increasing need for wilderness and the growing pressures on existing designated areas, the P.A. proposes only a single additional area for wilderness.

My strongest concern in this regard is the lack of a wilderness area proposal for the Guadalupe Mountains and Peloncillo Mountains. This highly interesting area has a unique flora and fauna, and it is not adaquately recognized and protected by the P.A. While you have dismissed the values of each component area for wilderness,

you have not shown why the entire area should not
be so designated. Indeed, the natural ecosystem
represented by the Baker Canyon, Guadalupe Mountains,
Bunk Mountain, and Guadalupe Canyon proposed Zoological
area, when considered as a whole, represents
a wild land area of first quality and fully
deserving of wilderness area designation. The
2 draft documents offer no compelling reason
for non-wilderness status but give trivial
reasons (E.G. "potential resource conflicts") for
rejecting artificial subdivisions of this natural
system. I urge you to reconsider and recommend
(along with the Whitmire Canyon W.S.A.) that this
area receive full wilderness area designation.

I would also suggest that the proposals for wilderness in the Mt. Graham area should be closer to alternative D than to the P.A. If an astrophysical site is to be developed on Mt. Graham, it should be done in such a manner that it would not be at the expense of the wilderness lands in that area.

The reason stated for rejection of the Bowie
3 W.S.A. as wilderness is also weak. Just
because there are "two parcels of private land
within the W.S.A.", it does not necessarily follow-

3 that the area "cannot be effectively managed..." There are numerous designated wilderness areas around the country with such inholdings - such as the Eagle Cap in Oregon and the Anaconda - Pintlar in Montana. Bowie Mountain also deserves wilderness designation.

4 I would also like to urge you to reconsider your rejection of several of the proposed new Research Natural areas. While I fully support and congratulate your proposals for Canelo and Sycamore Canyon R.N.A.'s, I would strongly suggest that you also propose the Lochiel, Scotia Canyon, Pine Canyon, Upper Guadalupe, and Mt. Graham wet meadows as R.N.A.'s. These are all unique and biological important areas, and the reasons you give for their rejection are weak. For instance, the reason stated for dropping Lochiel is that it duplicates the Elgin R.N.A. habitat. However, it is being increasingly recognized that R.N.A. "cells" should provide more than one representative of each ecosystem type, in case of catastrophic destruction of one or the other. also, I could find no rationale at all in the draft for the rejection of the Pine Canyon parcel. I hope that you will correct this situation in the final

plan.

all of your proposed changes in existing R.N.A.'s
seem to be reasonable and deserving. However,
I do feel that management prescriptions for
both the South Fork Cave Creek and Guadalupe
Canyon Zoological-Botanical areas should entirely
5 prohibit *any* domestic livestock grazing. Such
land use would be a mockery of the intent
and purpose of the areas and is entirely
inappropriate in areas whose goal is to protect
the community integrity of natural ecosystems.
This is particularly true in Cave Creek.

I would also like to see the road into the
South Fork Cave Creek area closed permanently,
6 both to prevent O.R.V. abuse and to help
restore and preserve the natural resource
values of this very special and often-abused
area. I would also suggest that the use of
7 tape recorders to attract birds should be
banned and subjected to fines in the Cave Creek
area, particularly during the nesting season.

I would like to strongly endorse your
plans to strictly limit livestock usage in
8 riparian zones and to actively promote the
regeneration of these habitats. Such action is *long*

overdue. I hope that your enforcement program is fully carried out.

9 Along this line, I urge the Coronado to vigorously pursue and prosecute law violations on the Forest, particularly those involving O.R.V. abuses, theft of native plants (especially cacti) and illegal grazing and occupation of public lands.

10 I am also concerned that, on P. 4 of the draft E.I.S. summary, you state that cactus is a "forest product" subject to public "demand". However, it is widely recognized that cacti species need protection from commercial exploitation. They should be regarded as a resource to be preserved, not as "products".

11 Another point I wish to emphasize is that the grazing of livestock should be prohibited on all range that is not in good or better condition. You state that 16% of the Forest's range is in poor condition and that it will take at least 20 years to reach a balanced stocking rate. This is absurd. Grazing of public lands by private commercial interests is a privilage, and it is entirely unacceptable for any public lands to be in poor condition. You also state that "intensified livestock production could displace some species (of wildlife)..." (Summary, P. 16). This, also, is not an acceptable use of public lands. On public

lands, the only lands available to wildlife, the needs of wildlife should always take precedence over livestock grazing.

I would suggest that you provide additional
information on your vegetation management program.
In particular, what species will be targeted for
12 removal and/or eradication? How do you define
noxious weeds? What herbicides will be used,
how will they be applied and where, when, and
under what controls will they be prescribed?

As an advocate of our nation's native
flora, I would support control of noxious weeds,
_if_ they are defined as non-native species or
invasive exotics. Native plants should _not_ be
the objects of eradication efforts, especially
12 considering the difficulty of identification in
such genera as _Lupinus_, where many species
may be rare. Also, herbicides should be
applied with a spot method, rather than
broadcast spraying, a practice that kills
many non-target plant species. Likewise,
the use of non-native species, especially grasses,
should be severely discouraged in revegetation
projects. These species often out-compete native
species.

A final reason for endorsing Alternative D

13 over the P.A. is the treatment of the proposed special Zoological-Botanical areas. In addition to the two areas proposed for Z.B.A.'s in the P.A., I believe that *all* of the other areas are fully deserving of such designation. Ramsey Canyon and the remainder of the Main Cave Creek area are world famous for their outstanding values as bird and plant habitat, and these values should be recognized through Z.B.A. designation. The Pine-Ramanote area is also especially deserving of Z.B.A. status. Clanton Draw, O'Donnell Draw, and Mt. Graham, while their acreages are small, would make important additions to the Z.B.A. concept on the Coronado.

By implementing the above suggestions, the Coronado Plan could move from a fair proposal to an excellent one, a status change to which the outstanding natural values of this Forest are clearly entitled. You are the managers of an important and widely prized national treasure; please let this be reflected in your final Forest Plan.

Thank you for your time and careful consideration.

Sincerely,

Mark Egger

Agency response to Mark Egger

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives, as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. We disagree that the Proposed Action (PA) is "highly biased" against the need to preserve the remaining wilderness lands on public property. We also disagree that reasons were not given for nonwilderness management recommendations. The National Forest System is mandated by Congress to develop and administer the renewable surface resources for multiple use and sustained yield of the several products and services obtained therefrom. Wilderness is only one of the many resources. There should be as "compelling" reasons to designate wilderness as not to.

   Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not

Agency response to
Mark Egger
(continued)

federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. Specific management direction would be determined through regular BLM planning procedures.

3. The Bureau of Land Management has reevaluated the recommendation for Bowie Mountain WSA as a result of your comments. As wilderness, BLM must ensure management to preserve the wilderness values of the area in the long term. Because of the two private inholdings and small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private lands within and adjacent to the WSA. The two areas you refer to are large in comparison to their private inholdings and to Bowie Mountain.

4. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even

Agency response to
Mark Egger
(continued)

desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

The desirability of establishing an RNA for wet meadows near the summit of Mt. Graham, within the proposed astrophysical development area will be addressed in the EIS now being prepared to evaluate the observatory proposal.

The plant community type of Pine/Canyon (Peloncillo Mtns.) area are well represented in other existing and proposed RNAs including Pole Bridge. This rationale has been added to the FEIS. Upper Guadalupe Canyon is a proposed ZBA and that designation compliments the current management direction for the BLM administered outstanding Natural Area in lower Guadalupe Canyon.

The plant communities of the Scotia Canyon area are also better represented in other RNAs, including Pole Bridge and Canelo.

5. We cannot agree that livestock grazing should necessarily be eliminated from the proposed Zoological/Botanical areas in South Fork of Cave Creek and Guadalupe Canyon. The special designation does not imply a set level of protection. Management is prescribed to fit the needs of the particular area, recognizing the emphasis on the unique ecosystem values present and the public enjoyment of them.

   Moderate, well-managed grazing has proven to be compatible with the riparian and other sensitive values in the Cave Creek Area. Both forks of the canyon have been grazed for many years, and the areas are well-known as a showcase of riparian vegetation and unique birdlife. We agree that the unique resources of the area must take priority over production of livestock forage, but feel that it has been demonstrated that the two uses are not mutually exclusive.

   Although the riparian area in Guadalupe Canyon has been adversely impacted by past livestock use, studies are currently underway to determine the condition and potential stocking rate of the Guadalupe Allotment. A combination of stocking and management will be planned in the next couple of years which will improve riparian condition and recognize the special wildlife values found there and to provide for the continued public enjoyment of those values.

6. We see no justification at this time for closing the road into the South Fork of Cave Creek. Public access is an integral part of establishing and managing zoological/botanical areas. Use of the area will continue to be monitored and future use restrictions considered when and if necessary. Motor vehicle travel will be restricted to the existing road.

7. We agree with you that the use of tape recorders to attract trogons is detrimental to reproduction in Cave Creek, and intend to continue the current ban. Your support for this controversial, but necessary action is appreciated.

8. We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing.

9. The Coronado N.F. will continue to enforce all laws, regulations, and permit requirements related to land and resource management abuses. Our

Agency response to
Mark Egger
(continued)

goal is to prevent these offenses initially through information and education.

10. The statement on page 4 of the DEIS Summary is as follows: "Demand of other Forest products such as cactus and beargrass fluctuate with local situations".

    Cacti, like other plant species on the National Forest are a renewable resource; which can be harvested without detriment to the plant community. We support the efforts of the State of Arizona and others to protect this important part of our heritage, but do not feel that intelligent management requires protection of every individual plant. All harvesting will be in compliance with the Arizona Native Plant Laws.

11. We agree with you that it is unacceptable for public lands to be in poor condition. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the First Period and 338,000 in the Second Period. As the range responds to improved range management, coupled with decrease numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs about ten percent less than present. Most of the necessary reductions will be on the rangelands now in less than satisfactory condition.

    The statement you refer to on page 16 of the DEIS Summary is: "Intensified livestock production could displace some species (of wildlife) even while increasing habitat for others". This is a general statement related to environmental consequences and use tradeoffs between wildlife and range resources. It is true in a general sense, but is relative to any particular alternative depending on the management direction for that alternative. The statement is not a goal or objective of any alternative as you seem to believe.

12. Table D-2 on page 128 of the Proposed Forest Plan lists targeted species for plant control and control methods contemplated. Table 19 on page 37 summarizes predicted acres of vegetation management practices. We have not attempted to define the term "noxious weeds". Each control project is designed for specific plant species, both native and nonnative. Native plants are sometimes targeted for control when they are out of their natural environment or have exceeded their natural density. No threatened or endangered species are targeted for control, and care is taken to avoid accidental removal of such plants by any control method.

    Tested and approved herbicides will be used in cases where this method is the most economical and environmentally sound control. All herbicide applications will be closely supervised by trained and certified personnel. Page 51 of the Proposed Forest Plan lists guidelines for using all chemicals on the National Forest.

    It is the intent of the Forest Plan to use the plant species in revegetation projects that will best meet the particular resource objectives. While it is often most desirable to utilize native species, they may not meet the objectives or be available, especially in an emergency. When prescribing seeding mixtures, we consider wildlife needs and the need to maintain plant diversity.

13. Zoological and/or Botanical areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the Plan, and others were considered as suggested by various respondents.

    In an attempt to limit this special designation to truly unique areas, we have excluded large areas within designated wilderness, such as the upper

Agency response to
Mark Egger
(continued)

South Fork of Cave Creek and the Ramsey Canyon watershed. We feel management as prescribed for the wilderness areas will provide the appropriate emphasis and protection without additional special area designations.

Management for the Main Fork of Cave Creek will emphasize wildlife oriented recreation opportunities. Refer to Management Area 3 in the Forest Plan.

The Pine/Ramanote area (Atascosa Mountains) is relatively inaccessible, therefore, a special management emphasis is unnecessary and inappropriate at this time. As you have noted, the Clanton Draw and O'Donnell Draw proposals are small. Their values are connected to the riparian zones which are afforded adequate emphasis for the present time under the management prescription for Management Area 7.

The question of a zoological/botanical area for the Mt. Graham area will be examined in the EIS being developed for the proposed astrophysical area.

0596

835 E. Orange Grove Rd.
Tucson, Arizona 85718

October 7, 1985

R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

RE: Draft Environmental Impact Statement for the CNF Proposed Plan

Dear Mr. Tippeconnic:

The mountains of southern Arizona afford rugged and spectacular
beauty to the growing number of people residing on the surround-
ing desert floor. In reviewing the Draft Environmental Impact
1 Statement and Proposed Forest Plan I would like to recommend
Proposed Action Plan D emphasizing protection for the natural
environment in general and also more wilderness protection. Some
2 of the items to consider deserving special protection are as follows--

1. Reduce over grazing
3 2. Limit road construction
4 3. Inlarge the RNA & ZBA's to insure the great diversity of wildlife & plant communities.
5 4. Establish the three WSA's in the Pinaleno & Peloncillio Mtns.
6 5. Stop the continued development on these mountains. This includes the astrophysical complex proposed for Mt. Graham.

As the west continues to expand these mountains will become more precious to all who follows by remaining essentially in a natural condition.

Sincerely,

Dan Fischer

Dan Fischer

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 9 - 1985
RECEIVED

Agency response to
Dan Fischer

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

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   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. We agree with you that it will be necessary to temporarily reduce grazing while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the First Period and 338,000 in the Second Period. As the range responds to improved range management, coupled with decrease numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs about ten percent less than present.

3. New road construction will be based on needs to meet specific resource management objectives. The Forest Plan predicts this need will be limited to low standard roads for wood harvest and mining activities. Approximately ten miles will be needed for wood harvest. We are unable to predict the need for mining but expect it to be minimal.

4. Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

   We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

   It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

Agency response to
Dan Fischer
(continued)

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5. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

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Agency response to
Dan Fischer
(continued)

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

6. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The comment period will be at least ninety days as it was for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0611

OCTOBER 9, 1985

CORONADO N.F.
OCT 10 '85

Action #	Init	Action #	Init	Action #	Init	Action #
FS		RES		LA		D
LMP		R&F		ARCH		
AO		PER		WL		SV
ENGR		AS		WS		$
AGE		CS		SLS		SC
RLT		LX		DISP		NARTC
FIRE		RECP		PIO/IS		COMM

R. B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

I write to offer my comments on the Coronado National Forest Management Plan.

1 **RIPARIAN AREAS** Special efforts should be made to ensure the preservation and restoration of these areas that contain such a high concentration of sensitive wildlife. The draft EIS states that: "Riparian areas have been damaged from past livestock grazings, intensive recreation use, fire, floods, and poor road allocation." I support the elimination of livestock and fuelwood harvesting in critical areas and favor better control of recreational activities in order to minimize human impact. I was unable to find comparative quantitative figures in the draft EIS for the various alternatives in regards to riparian areas. However, the final management plan should maximize the protection of these areas.

2 **WILDERNESS** I support wilderness designation as proposed in Alternative D. Now is the time to continue protection for the Wilderness Areas in the Peloncillo Mountains (Bunk Robinson and Whitmire Canyons).

3 **MT. GRAHAM** I oppose the development of Mt. Graham for an astrophysical site or any other purpose. The impact of development on the unique biological resources already present make development a totally unsatisfactory management option. Instead of spending millions of dollars on an inefficient earth-based astronomical site (destroying a biological treasure in the process) why not launch several hi-tech space-based telescopes? Please exclude Mt. Graham from further consideration for development and leave it as the valuable wilderness area that it currently is.

SPECIAL AREAS:

4 **—Research Natural Areas** I support the proposed reduction in the Santa Catalina RNA if the proposed additions of Pine/Ramanote Canyons, Ramsey Canyon, Sycamore Canyon, Canelo, and Mt. Graham's Wet Meadows and three mountaintop Cienegas are made.

5 **—Zoological and Botanical Areas** The Proposed Action is considerably lacking in protection of areas of unique biological significance. I support additions of acres in the following areas:

A. South Fork Cave Creek
B. Main Cave Creek
C. Clanton Draw
D. O'Donnel Creek
E. Mt. Graham

6 **RECREATION** Clearly, provisions must be made to accommodate the increasing demand for most types of recreation on the Coronado National Forest. I feel that highly developed areas (such as would be needed to support large RV's and concessionaires) are detrimental to the harmony of the Coronado National Forest. Instead, developed areas should provide for light/low impact use and not be an extension of the urban congestion, noise, and pollution that most forest users are trying to escape. The needs of picnickers and car campers should be anticipated and met. Developing the areas for use by the public in a manner that minimizes impact on the natural surroundings is the Forest Service's greatest challenge. 7 Vehicular traffic should be restricted to existing roads. No new roads need be built.

8 **RIGHTS OF WAY; ACCESS** Some of the intense pressure on the Catalina, Rincon, and Santa Rita Mountains would be eased if better access were provided to the other ranges. Many private land owners have posted "PRIVATE LAND--NO TRESPASSING" signs that deter me from accessing Forest Service lands.

9 **ACID RAIN** I support the Forest Service's current efforts to investigate the frightening deterioration of trees and waterways that is reportedly occurring in the West. I urge that the Forest Service issue an annual report of its activities, findings, and actions until the problem is identified and controlled.

10 **PUBLIC INFORMATION AND EDUCATION** I encourage the Forest Service to disseminate information to the public about the value of the available natural resources and to promote regular exercise, outdoor recreation, and use of the forest. The Forest Service can take the lead in demonstrating the fragility of the desert-mountain environment and should suggest how the public can live in harmony with that environment. The display concerning water in the desert that used to be on display at the Sabino Canyon Visitor's Center was an excellent example.

Thank you for the opportunity to offer my comments.

Sincerely,

T. Flood

Tim Flood, M.D.
3935 N. Country Club, #21-A
Tucson, Az. 85716

3 P.S. Please place ny name on the list to receive the EIS for Mt. Graham when it becomes available.

Agency response to
Tim Flood, M.D.

1. We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing.

   Fuelwood harvest and recreational activities will also be carefully administered and monitored in riparian areas. Management Area 7 of the Forest Plan provides specific management direction for these areas.

   We did not use quantitative figures in the DEIS to estimate environmental consequences of each alternative on riparian areas. Since these are key areas, all alternatives were designed to achieve satisfactory conditions by Period 5. The difference between alternatives is in the way uses would be regulated.

2. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

Agency response to
Tim Flood, M.D.
(continued)

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

4. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

The desirability of establishing an RNA for wet meadows near the summit of Mt. Graham, within the proposed astrophysical development area will be addressed in the EIS now being prepared to evaluate the observatory proposal.

Agency response to
Tim Flood, M.D.
(continued)

The plant community types of Pine/Ramanote area are well represented in other existing and proposed RNAs including Pole Bridge, Santa Catalina, Goodding and Canelo on the Coronado N.F. The Pine/Ramanote area is quite remote and access would be too difficult to accomplish research objectives.

We are, however, willing to study, with other interested parties, the desirability of designating a ZBA in that area.

Although the Nature Conservancy has an excellent facility in the lower portion of Ramsey Canyon, we do not believe the National Forest lands above that merit special area designation, especially since that area is well protected by wilderness designation.

The Canelo and Sycamore Canyon RNA additions would be made as part of the Forest Plan.

5. Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the Plan, and others were considered as suggested by various respondents.

   The Forest Plan (Management Area 14) does recommend a zoological/botanical area for the lower portion (762 acres) of the South Fork of Cave Creek. The upper part of the watershed is within a designated wilderness. Management of the wilderness area will provide adequate emphasis and protection for that area.

   The Main Fork of Cave Creek will be managed to emphasize wildlife oriented recreation opportunities. This direction is included in Management Area 3 of the Forest Plan. This is a large watershed and an additional special designation was not felt appropriate given the emphasis for zoological/botanical areas.

   The values of Clanton Draw and O'Donnel Creek are specifically related to the riparian areas. At this time, we feel sufficient management emphasis and direction is given in Management Area 7 to protect these areas.

   The question of a zoological/botanical area for the spruce-fir type on Mt. Graham will be evaluated in the EIS being prepared for the astrophysical proposal.

6. We agree with your suggestions for the types of recreational opportunities suitable to the Coronado National Forest. By working with other agencies and private enterprises, we hope a total spectrum of opportunities can be provided to the public.

7. The purpose of the Forest Plan policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   The transportation system for the Coronado National Forest is considered to be adequate at this point. Road management emphasis will be on maintenance and reconstruction of existing roads. The Forest Plan predicts only ten miles of new roads for fuelwood access will be needed during the life of the Plan.

Agency response to
Tim Flood, M.D.
(continued)

8. We agree that access to public lands of the Coronado National Forest is a critical problem and the proposed Forest Plan calls for a very significant increase in right-of-way acquisition. In order to achieve the goal of reasonable access to all parts of the Forest, we must count on the cooperation of other Federal, State, and County Agencies as well as private landowners who have an interest in road management and access. We feel acquisition of rights-of-way across private lands within the Forest boundary is primarily our responsibility, while access to the Forest boundary should be a shared responsibility of Federal, State, and County Agencies. We are willing--even anxious--to work with other agencies to acquire needed public access. The unique "Islands in the Desert" nature of the Coronado National Forest sets it apart from other forests in the National Forest System. The scattered ownership pattern due to the isolated mountain ranges in this area results in a real challenge to satisfy the need for public access. As noted above, we must count on the cooperation of all to meet that challenge.

9. The question of acid rain is a national if not international concern. For this reason, investigations of its impacts are the direct responsibility of State Environmental Agencies and the Environmental Protection Agency. They provide periodic reports on their activities, findings, and actions. The role of the National Forest has been to identify unusual effects on vegetation and wildlife. If the effects are determined to be air pollution related, the above authorities are notified so they can take appropriate actions.

10. Thank you for supporting National Forest information and education programs. Unfortunately these programs are some of the first to suffer when finances are tightly constrained. We hope to revive a visitor's center for Sabino Canyon with the help of interested citizens.

8/5/85

COMMENTS

0681

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 7 - 1985

RECEIVED

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than

______________________.

Please print or otherwise write legibly - Thank you.

Comments: Proposed plan is fine
for me since I own one of
the Cabins in this Recreational area.
1 I'd like the Camp ground beyond
our cabins to be open to the public.
I can't see where there has been vandalism
up there. - Let them camp up there
over night or all week-end - if you
feel they should pay a fee - that's fine
2 Could you stock one of the dams
up there so the youngsters could
fish?

Name: Catherine (Kay) Forsythe Date: 10/4/85

Address: 1528 - Antonio Dr
Douglas, Az. 85607

Agency response to Catherine Forsythe

1. Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

   Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

   During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

   The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

   The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

2. The Forest Plan would attempt to maintain the John Hands and Herb Martyr Lakes for fishing opportunities. This may be difficult due to continuous needs for removing silt and debris.

10 | 4 | 85

COMMENTS

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 7 - 1985
RECEIVED

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

0577

All comments must be received by the Coronado National Forest no later than
Oct. 11, 1985.

Please print or otherwise write legibly - Thank you.

Comments: I am in favor of the proposed action for South Fork in Cave Creek.
1 I am not in favor of making a day use only campground. I am in favor of alternative (B).

2 I also wish to receive the Mt. Graham E.I.S.

Thank you
Steve Forsythe

Name: Steve Forsythe

Date: October 4, 1985

Address: 1528 San Antonio Dr.
Douglas, Arizona
85607

Agency response to
Steve Forsythe

1. Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

   Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

   During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

   The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

   The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

2. We look forward to any comments you may have once the proposed Mt. Graham Astrophysical Area draft EIS is released for public comment. The public comment period will last at least ninety days as was the case with the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

AUG 22 1985

RECEIVED

0093

Robert Tippeconnic
Forest Service
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

August 19, 1985

Dear Mr. Tippeconnic:

1 In the Multiple Use Act which the Forest Service is entrusted to follow five different types of use are mentioned 1) outdoor recreation, 2) range, 3) timber, 4) watershed, and 5) wildlife and fish. Yet Steward Observatory is proposing the top of Mt. Graham to be developed into numerous observatory towers with a significant number of support buildings. I am baffled as to why an Environmental Impact Statement (EIS) is being done to accommodate structures that do not fit into the Multiple Use description of the Forest Service.

2 Given that the Draft EIS is, in fact, being developed I have various concerns that I wish the Forest Service to address in the forthcoming Draft EIS. In addition to the above question about Multiple Use please answer the following:

1) What is the projected life span of an observatory before it becomes outdated and obsolete? What is the expected lifespan of observatories already operational? Tumamoc Hill was built only ten years ago by Steward Observatory and is now unused. Even if this figure were to be multipled by a factor of five does this justify the sacrafice of Mt. Graham, when there have been suggestions that developing this site could irreversibly damage pristine ice age environment?

2) The Submillimeter Telescope (SMT) at this phase is the major funder of the Mt. Graham Observatory proposal, yet the SMT does not require darkness. What is the justification for allowing the SMT to spoil a virgin mountain top when there is no need? The same research can be done by SMT at a location already spoiled by the various astronomical facilities throughout the other mountain ranges around Tucson. How much better is Mt. Graham than other mountains near Tucson such as Mt. Lemmon for SMT observations? Isn't Hawaii at least as good a site as Mt. Graham for the SMT? Are there any outside impartial group(s) checking the quality of these sites for astronomical observing or is it only Steward Observatory and others such as the Smithsonian Institute who works directly with Steward Observatory?

Isn't this a conflict of interest?

3) Where will the funding come from for snowplowing the road up to the proposed observatory? Funding for road building? Funding for road improvement? I suggest that winter use of FS 507 be excluded for ANY use including the observatory, to allow the summit area time to rejuvinate before spring time and to keep maintenance costs down.

3 4) In the Arizona Wilderness Act the Senate Bill set aside 62,000 acres for the Mt. Graham wilderness study, while the House bill set aside 65,000 acres. Why is there such a discrepency? In addition, the Steward Observatory proposed site does not fit properly into the Wilderness Study Area boundries. How can such inexactness occur? How can such inexactness be allowed? And finally what is the truth?

Mt. Graham holds one of the most precious landscapes within a short drive of Tucson which is the prime factor being used by the astronomers, but this makes it all the more important to save from development. The site in Hawaii (the other proposed alternative) is at least as good and is already partially developed. If the astronomers' goal is purely scientific then let them fly to Hawaii rather than exploit another mountain top. The additional amount of money it will cost them is well worth it to save such an important eco-system. Save Mt. Graham for the bears, red squirrels, rabbits, birds, etc. Keep the road closed all winter and merely change the present status of the mountain top to make it ALL wilderness area!

2 I am aware that a minimum of 45 days is required to review the Draft Environmental Impact Statement but due to the following reasons I urge the Forest Service to extend the hearing period to a full 90 days:

1) The general proposed plan for the Coronado National Forest did not include Mt. Graham therefore making the review of the Draft EIS much more complex and difficult.

2) The Mt. Graham proposal itself being such a complex issue, plus the biases inherent in the information gathering process.

3) The amount of contraversy surrounding Mt. Graham.

I am looking forward to receiving some firm answers to my questions. Thank you in advance.

In peace and justice,

L. Fuentes-Williams

L. Fuentes-Williams

L. Fuentes-Williams
P.O. Box 43964
Tucson, AZ 85733

Agency response to
L. Fuentes-Williams

1. The Multiple-Use Sustained Yield Act of 1960 is only one of many laws or acts which govern management of the National Forests. For example, the Acts of June 4, 1897 (Organic Act) and March 4, 1915 provide the basic authorities for permitting special uses, such as astrophysical sites. Any legitimate proposals for use of the public lands must be evaluated through an environmental analysis which may result in preparation of an environmental impact statement.

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

3. Although there may have been different versions of the Mt. Graham Wilderness Study Area (WSA) during negotiations between the U.S. Senate and House of Representatives, the final WSA was established at 62,000 acres by the 1984 Arizona Wilderness Act. The proposed astrophysical area (3500 acres) does not overlap the Mt. Graham WSA although they are adjacent to one another in one place.

GEOCON, INC.
Exploration and Mining Geology

P.O. Box 2093 • Evergreen, CO 80439
Phone (303) 674-1272

RICHARD L. NIELSEN • ERICH R. LASKOWSKI • CONSULTING GEOLOGISTS

0239

September 4, 1985

Mr. R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Re: Draft Environmental Impact Statement
Coronado National Forest Plan

Dear Mr. Tippeconnic:

I appreciate this opportunity to review and comment on subject plan and DEIS. These generally are sound and well prepared documents and address most concerns regarding management, use and preservation of public lands within the Coronado National Forest. A particularly strong point of the plan is that the Proposed Action takes into account the desires and needs for recreation and employment opportunities of people living in southeast Arizona. The PA will attempt to preserve and conserve truly unique resources without closing large areas to recreation and resource development.

As you know, the Coronado National Forest is richly endowed with mineral resources. I therefore would like to comment on some concerns I have regarding the manner in which mineral issues are addressed in the plan and DEIS.

1. Issues

Withdrawal from mineral entry is an important issue but not the only one of concern. A second important issue is that at the appropriate time, the orderly development of mineral resources should be possible because access and land use required by mining activities is assured. How does each alternative provide for orderly development of mineral resources? This issue is not fully addressed in the DEIS.

1

2. Alternatives

Obviously, Alternative D, which calls for additional wilderness areas, will require significant withdrawals from mineral entry. But other than this, the DEIS does not outline clearly how each considered alternative will provide for land use and access required by possible future mining activities.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

SEP [illegible] 1985

RECEIVED

3. Affected Environment

2 The plan and DEIS should have: (1) a narrative and summary of existing active mining operations; (2) a summary of major unmined mineral resources within the forest, (e.g. Red Mountain Cu-Mo alunite, and Helvetia Cu-Mo, Marble Peak Cu, Hardshell Ag); and (3) a summary of past mine operations where further exploration may yield additional mineral reserves (e.g. Trench mine Pb Zn Cu Ag, and Worlds Fair mine Au Ag). These properties should be shown on a map and critical data on commodities, size, production, reserves and location should be summarized in tables.

4. Environmental Consequences

3 Anticipated or potential development of mineral resources should be reviewed in the plan. How much area will be affected if production begins at Helvetia, Red Mountain or Hardshell? Will special withdrawals be required to protect the forest near these areas of production? When can development or production reasonably be expected to begin? Access requirements (roads and power supply) for development and their impact on the forest should be reviewed. How does each considered alternative impact or affect possible development? These are some of the questions that should be considered in the DEIS.

In summary, the Coronado National Forest contains some major undeveloped mineral resources. In addition, major mines with significant past production are present in the forest and likely will yield future minable reserves with further exploration. The forest plan and DEIS should summarize and review those resources, where they are located and how possible future development will affect other non-mineral resources and uses of the forest.

I believe the issues raised by possible development of mineral resources should be considered in any plan for management of the land in the Coronado National Forest because of the strong possibility of mineral discovery and development in this mineral-rich area.

Sincerely yours,

Richard L Nielsen

Richard L. Nielsen
Consulting Geologist

RLN:dkw

Agency response to
Geocon, Inc.

1. Forest Service policy toward mineral activity on National Forest System lands is implicit in law. The following policy is summarized by the guideline found on page 45 of the Draft Plan.

All minerals on the public domain, except those specifically subjected to other disposal by Congress, are subject to appropriation by the location of mining claims. The 1872 Mining Law was a grant by Congress of the right for individuals to go on the vacant, unappropriated public domain to search for, disclose, appropriate, produce, and process the minerals. It was a grant also of the right to use surface and surface resources necessary to those operations and of reasonable access to them. The grant is limited only in that unnecessary or unreasonable activities are not authorized.

Sales of common materials are made under the authority of the Materials Act of 1947, as amended (Material Act). Leases are made under the authority of the Mineral Leasing Act of 1920, the Leasing Act for Acquired Lands of 1947, the President's Reorganization Plan No. 3 of 1946, the Geothermal Steam Act of 1970, and the Coal Leasing Amendments Act of 1975 (Leasing Laws), most of which have been amended one or more times.

Three other laws have major relevance to the Forest Service function relative to minerals and the effects of mineral activity. The Mining and Mineral Policy Act of 1970 (MMPA) provides a National policy which must guide the Forest Service. The Federal Land Policy and Management Act of 1976 (FLPMA) provides for an information base for locations under the 1872 Act and defines the basis for removing Federal land from mineral activity. The Wilderness Act of 1964 limits the application of the Mining Law and the Leasing Laws, and in certain situations reduces the rights accorded to those operating under the Mining Law.

The effect of these major mineral laws can be summarized:

- The Forest Service is required by MMPA to foster and encourage private industry in mineral endeavors.

- The Forest Service must consider that all land is available for mineral search and development unless it is withdrawn from operation of the mineral laws. Land management plans cannot lead to decisions against mineral development unless the 12 criteria of FLPMA have been met.

- The initiative for mineral development lies with the mineral developer. This is a pro-active role that can be expressed by the filing of a mining claim and presentation of a notice of intent or a plan of operations; an application to lease; or an application to buy mineral materials.

- The Forest Service role is primarily reactive; a response to the developer's initiative.

- Forest Service authority to protect surface resources during mineral activity is limited, and most limited in the case of the Mining Law. Damage to surface resources cannot be prevented, only minimized.

Minerals are fundamental to the Nation's well-being. The National Forest System by coincidence of geology and geography is a principal storehouse of minerals and energy. The search for and removal of minerals and energy resources are authorized uses of the National Forest System, to be encouraged and facilitated in accordance with the National Mining and Mineral Policy Act and conducted to the public interest. Therefore, the Forest Service must:

- Respond positively to proposed mineral and energy activity.

Agency response to
Geocon, Inc.
(continued)

- Include professional assessment of mineral and energy resources in decision-making.
- Administer the mineral laws and regulations.
- Acknowledge and accept that mineral production from areas having that capability may well be the highest and best use of the land; that the impacts from responsibly-conducted mineral exploration, development, and production are relatively short-term effects; and that, in the long term, the impacts may enhance other resources.

The Forest Service objective is to carry out the mineral management mission in a fair and timely manner, consistent with multiple-use management principles, to integrate the exploration, development, and removal of mineral and energy resources with the use and conservation of other resources. The Forest Service will, through appropriate regulations and plans of operation, seek to minimize adverse impacts to other resources while fulfilling our mandate to foster mineral development.

2.& 3. You indicate the DEIS did not adequately describe the known mineral endowment or potential of the Coronado National Forest. We have added additional narrative and a table to the Minerals Section, Chapter 3, FEIS, to summarize the local, Regional, and National significance of the Coronado National Forest's mineral resources and mineral potential. In addition, we have revised Table 33, Chapter 3, DEIS, to show the relationship between areas with mineral potential and areas available for mineral activity. Additional narrative has been added to the Minerals Section, Chapter 4, FEIS, discussing the significance of mineral withdrawal impacts of each alternative on mineral exploration and development.

Site or project specific consequences such as you suggest for Helvetia, Red Mountain or Hardshell are outside the scope of this Forest Plan. The environmental consequences would have to be addressed in a separate environmental analysis once the specific development plans are known.

GEOCON, INC.
Exploration and Mining Geology

P.O. Box 2093 • Evergreen, CO 80439
Phone (303) 674-1272

RICHARD L. NIELSEN • ERICH R. LASKOWSKI • CONSULTING GEOLOGISTS

September 4, 1985

0240

Mr. R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

1 Enclosed are my comments on the proposed Management Plan and DEIS for the Coronado National Forest. I note the plan contains extensive lists and tables describing the animal and plant species present in the forest. It does not, however, contain a similar tabulation of (1) active mining operations; (2) mineral reserves destined for development; and (3) past mining operations or mineralized areas where future exploration activities will yield minable reserves. This is a serious omission. Any management plan must take into account the location, size and characteristics of mineral reserves. Consideration must be given to the impact their development will have on other uses of the forest.

As a mining consultant, and employee of Kennecott and Anaconda, I have worked on many mineral exploration projects in the Coronado National Forest during the past 25 years. I am thoroughly familiar with the data base on natural resources in the area. I can prepare for you, on a consulting basis, a table of mines, reserves and mineral production similar to that prepared for the Choteau quadrangle (see attached). Tables or narrative providing an estimate of probable potential developments and an assessment of areas where future exploration is likely to be concentrated can also be prepared. I estimate these documents can be prepared and delivered within one month at a cost not exceeding $8,000.00 total.

I enclose a brief resume indicating my qualifications to take in this assignment and I will contact you in a week or two to determine your interest.

Sincerely,

Richard L. Nielsen

Richard L. Nielsen
Consulting Geologist

RLN:dkw

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 9 1985
RECEIVED

best copy available

RICHARD L. NIELSEN
32651 Meadow Mountain Road
Evergreen, Colorado 80439
(303)674-4926 (Home)
(303)674-1272 (Office)

EDUCATION

B.S. (1955), M.S. (1957), Geology, Caltech, Pasadena, California
Ph.D. (1964) Geology, University of California, Berkeley, California
Short Courses: Photogeology, Management Training, Geostatistics, Uranium Industry, Management of Exploration, Interpersonal Relationships, Economic evaluation of ore deposits and others.

PROFESSIONAL EXPERIENCE

1980 - Date Consulting Geologist. Locates prospects, properties and targets for gold-silver deposits mainly in the southwest U.S. Activities include geologic evaluations, economic appraisals, geochemical surveys, land status studies, running drill programs and coordinating permitting or reporting to government agencies. Clients include Hecla, Hanna-Getty, Anaconda, Billiton, Cominco and Pancontinental. I helped define ore target at Republic, Washington that resulted in discovery of new ore shoots that will prolong life of Hecla's Knob Hill mine.

1977 - 1980 District Geologist, Anaconda Company. Uranium exploration, development and management in the Rocky Mountains and Colorado Plateau. I was involved in major uranium exploration projects; and managed and organized a major drilling program that resulted in discovery of a large uranium resource at Green Mountain, Wyoming. I maintained stewardship over a budget up to $5 million and a staff of up to 15 professionals, technical people and contractors.

1974 - 1977 Chief, Geologic Research Division, Kennecott Exploration, Inc., Salt Lake City, Utah. Organized and managed several research projects aimed at improving discovery of porphyry copper deposits in western U.S.; managed geochemical laboratories. Groups under my supervision had an operating budget up to $2 million and staff of about 50.

1964 - 1974 Senior Geologist, Geologist, Kennecott Exploration, Inc. Exploration research, geologic problem solving and prospect evaluation with experience in North America, Asia, Australia and Caribbean. Familiar with ore deposit models and economics for gold, silver, copper, molybdenum, lead, zinc, nickel and many stratigic and industrial non-metallic commodities. I helped define ore targets resulting in discovery of porphyry copper mineralization in Indonesia, and participated in early recognition of ore potential at Equity silver deposit in British Columbia and the Pueblo Viejo gold property in Dominican Republic.

PROFESSIONAL ACTIVITIES

Mineral Exploration Coalition, Member of the Land Use Planning and Government Action Committees. Society of Economic Geologists, Counselor and member of Publications and International Lectures Committees. Geological Society of America, Fellow. Denver Region Exploration Geologist Society, Program Chairman 1980-1984. National Western Mining Conference and Exhibition, 1985 Geology session Chairman. Adjunct Professor, University of Utah 1974-1976, and University of Colorado 1981-1985. Author of 15 technical and scientific articles.

EXHIBIT 3

Table 2.—Mines and mineral production in the Choteau 1°x2° quadrangle, Montana

[I, inactive; A, active; NR, not recorded]

Mine	Status	Longitude (north) Latitude (west)	Commodity	Value or amount of production	Mode of occurrence	Remarks
Anaconda	I	47-02-26 112-21-31	Au,Ag,Cu,Pb,Zn	$30,000	Vein	Inactive since 1926.
*Bear Gulch	A	47-06-03 112-29-23	Ag,Cu	NR	Stratabound	Intermittently active.
Bobby Boy	I	47-02-05 112-24-12	Pb,Cu,Ag	NR	Vein	Inactive since about 194
Calliope	I	47-03-20 112-21-32	Au,Ag	$11,000	Vein	Production 1890-1896.
Carbonate	I	47-02-26 112-22-45	Pb,Ag,Zn	$3,000	Vein	Inactive since 1949.
Consolation	I	47-02-26 112-21-31	Au,Ag,Pb,Cu,Zn,Mo	1 carload	Vein	None.
Copper Bowl	I	47-06-52 112-24-10	Cu	NR	Vein(?)	None.
Copper Camp	I	47-05-08 112-44-07	Cu	NR	Vein	None.
Cotter	A	47-03-57 112-41-55	Cu,Ag	NR	Vein	Intermittently active.
Giant Lode	I	47-02-19 112-43-11	Au,Cu,Ag,Pb	NR	Vein	None.
Glacier Prospect	I	47-44-51 113-17-02	Ba	NR	Vein	None.
Harwood	I	47-01-37 112-10-17	Cu,Ag,Au	1.3 tons	Vein	None.
Iron Hill	I	47-02-26 112-21-31	Pb,Zn	NR	Vein	None.
Keep Cool	I	47-02-26 112-36-33	Au	NR	Placer	None.
Liverpool	I	47-01-31 112-39-04	Au	NR	Placer	None.
Midnight	I	47-02-26 112-21-31	Au,Ag,Cu,Zn,Pb	NR	Vein	Inactive since 1958.
Mike Horse	I	47-01-32 112-21-31	Au,Ag,Cu,Pb,Zn,Bi	$6,942,565	Vein	Inactive since 1950.
Paymaster	I	47-02-26 112-22-45	Pb,Zn	about 100 tons	Vein	Inactive since 1927.
Rex Beach	I	47-02-26 112-21-31	Pb,Ag,Cu,Zn,Au	NR	Vein	None.
Rosetta	I	47-01-37 112-09-02	Cu,Ag,Au	$25,516	Vein	Production 1922-1926.
Susan	I	47-10-23 113-22-34	Ag,Cu	NR	Stratabound(?)	None.

---

*Also known as the Adele mine and as the Alyce Creek mine.

EXHIBIT 7.

G. Areas of Future Exploration

In addition to the current activities described in the locatable, leasable and salable mineral sections, the following areas may be targets for future mineral exploration within the Forests:

1. Colorado Mineral Belt. In the Breckenridge Mining District, there is an ore/structure relationship where faults acted as corridors for solutions with deposition occurring in the weak zones of the bedrock adjacent to the fault zones. In the Montezuma Mining District, ore may be found 1) in the brecciated zones of the Williams Range fault where it crosses mineralized fissures and 2) by locating bismuth enriched veins which may be associated with molybdenite veins, an indication of possible molybdenum stockwork deposits at depth. In the Upper Blue River Mining District, favorable areas include the Precambrian rocks between North Star Mountain and McCullough Gulch where mineral zonation occurs, and along the Boreas Pass fault near past producers which may lead to concealed ore bodies. In the Kokomo Mining District, additional sulfide deposits may occur in downfaulted segments of known ore bodies, or in projected areas across from structures with known ore-bearing units. In the Gore Range area, there is potential increasing to the south for deeply buried deposits in limestone adjacent to the Gore fault. In the Gilman Mining District, additional silver-lead-zinc deposits may be found downdip from the abandoned Eagle Mine. In the Lincoln Gulch Mining District, there is potential for copper and molybdenum in mineralized breccias beneath ash-flow tuffs in the western half of the Grizzly Peak cauldron. In the Aspen Mining District, favorable areas include the Belden/Leadville contact and the zones adjacent to porphyry sills in the Belden.

   Mining activity in or near past producing areas of other mining districts are places to start an exploration program. Overall, the Mississippian Leadville limestone is considered a favorable target particularly near past production areas.

   There are numerous color anomalies and areas with surface alteration on the Forest including Webster Pass, the Wire Patch Mine area (Breckenridge Mining District), Swandyke, Middle Mountain, Mt. Baldy, Cataract Creek, Cinnamon Mountain, Paradise Basin and Conundrum Creek. These areas are excellent exploration targets for deep-seated stockwork deposits. Continued exploration should be expected in these and other areas previously mentioned.

   There are several areas with clusters of molybdenum occurrences. These areas are from Mt. Emmons north including Paradise Stock, Mt. Belleview, and Treasure Mountain Dome; around the Grizzly Peak caldera; and, from the Montezuma Stock to the Humbug Stock and south along the Mosquito fault.

   Recent placer discoveries along Keystone Gulch indicate that previously unexplored drainages anywhere on the Forest and specifically Summit County may become areas of renewed interest particularly if adjacent to past producing areas.

EXHIBIT 8
(EIS - APPENDIX
Potential for Development

economic projection for the eight analysed metals over the period from present to 1990 is difficult to forecast. However, certain near term market conditions appear to set reasonably predictable patterns. Quite clearly, longer range projections are subject to multiple variables well beyond the limited scope of the metal market. In the overall analysis, the general state of the national economy will dictate demand. If the present Federal administration is successful in revitalizing the economic climate through industrial growth, increased metal commodity consumption will inevitably follow.

The following represents a "best guess" for supply and demand of major metals through 1990. The reader is advised that these projections are based on current consumption trends, domestic availability and the "friendliness" of foreign suppliers. If, for example, traditional overseas sources reduce strategic metal imports for various reasons (political, economic, etc.), the projections could quickly become invalid or subject to drastic change.

1. Copper - The current domestic availability is excellent. Many mines are presently operating well below full production capacity. In fact, numerous copper mine closures over the past year demonstrate that current supply and stockpiles are high and demand is relatively low. The current price structure is very soft. The projected near-term (2 years) outlook on demand is similar to present conditions. Metal analysts predict demand and prices will rise to more productive and equitable levels through 1990. However, much of copper's future depends upon whether the current demand for the metal in the electronics and communication industries will be partly replaced by artificial superconductors. Current reserves are probably adequate to supply industry during the present planning period. However, if the outlook for copper improves, domestic exploration will certainly increase to delineate future deposits. A few companies are maintaining an active exploration level for reserve copper with the justification that competition is down.

2. Lead - Last year, lead demand and prices improved to some degree but, in recent months, demand has dropped. "Best guess" by metal analysts is a gradual price increase keeping pace with inflation. Domestic supply appears adequate through the planning period.

3. Zinc - The zinc market has improved from its low of several years ago. However, zinc is currently not an attractive exploration commodity because of both its relatively low price and very costly smelter charges. As with lead, the zinc price will probably, at best, keep pace with inflation. Currently, lead and/or zinc deposits are mainly explored only if significant other credits (particularly precious metal) are present. A few analysts predict a zinc comeback in the late 1980's as stockpiles diminish.

4. Molybdenum - The molybdenum market is down significantly from its high of two years ago. Production decions for several large proven Mo deposits (including Mt. Tolman) have been deferred because of current poor market conditions. Overall, the price and

Agency response to Geocon, Inc.

The information which you have offered to provide as a consultant is already available to us and was used in development of the Proposed Plan. The details are contained in associated planning documents and only the appropriate summary information was included in the DEIS. Please refer to pages 79 and 80 of the DEIS.

Also please see our response to your additional letter dated September 4, 1985.

0502

CLAYTON R. GIBSON
5110 E HAWTHORNE R
TUCSON, AZ. 85711

PROPOSED FOREST PLA
EIS 03-05-85-1

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
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1 OCT. 85

Gentelmen

After careful consideration of all alternatives
our family feels that the Proposed Action is
the most desirable.
In roads & trans. sys. B would be a
better choice. The road from Portal thru onion
saddle to lower Pinery is in terrible condition.
1 Few places through out all the forests is there
sufficient parking for use of hinterland trails.

Some overnight camping should remain in
Cave Creek. Few people aspire to having lunch
2 in a camp ground after 100-150 mile journey,
to be forced to move to a camp ground acceptable
for over night use, perhaps an hours drive away.

After a trip to Mt. Hopkins we strongly
3 recommend Mt. Graham for astrophysical use.

4 Would you please add the 2 following people
to your mailing list.

CHARLES WELCH
2838 STRAND
HERMOSA BEACH, CALIF.
90254

JENNEFER BOND
2000 N. ST. N.W. # 1018
WASHINGTON D.C. 20036

Thank You
Clayton Gibson

Agency response to
Clayton R. Gibson

1. Thank you for your support of the proposed Forest Plan. The Pinery Canyon to Portal Road is currently being maintained to allow safe travel for prudent drivers of passenger cars. Speed and user comfort are not considerations at this level of maintenance. Maintenance levels are assigned based on the type and number of anticipated Forest users. Although higher maintenance levels might be prescribed for particular roads, the actual level of maintenance is often adjusted because of available funding.

   Development of trailhead parking is dependent on the anticipated use for each trail and available funding.

2. Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

   Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The Three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

   During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been moderate.

   The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

   The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

3. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the

Agency response to
Gibson, Clayton R.
(continued)

document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

4. We have added the requested names to our Forest Plan mailing list.

0486

Kenneth Goldsmith
555 Forest Road
Northford, CT 06472

Sept. 24, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 30 1985
RECEIVED

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, AZ 85701

Dear Sir,

1 I write to express my very strong opposition to the Coronado National Forest Proposed Plan. Although I live in Connecticut, I have come to know the Coronado NF very well over the years since the greater part of my family resides in Tucson. I have also spent several seasons at the Southwestern Research Station of the American Museum of Natural History in Cave Creek Canyon, assisting my father (a professor of biology at Yale University) with scientific research. The Coronado NF is truly unique, a national treasure. In terms of biological diversity and importance, no other National Forest can compare. Unfortunately, the Forest Service bureaucracy has once again demonstrated its inability to provide adequate protection for the lands under its "care."

2 Perhaps the most egregious aspect of your proposed plan is the less than minimal wilderness recommendation. ALL of the Forest Service and BLM Wilderness Study Areas considered in the plan deserve wilderness protection and present few or no resource conflicts. The single exception might be a powerline corridor (but NOT a tramway) up Mt. Graham. I particularly urge wilderness designation for Bunk Robinson, Mt. Graham, Whitmire Canyon, and Guadalupe Canyon.

3 I am also extremely dissappointed in your recommendations for Research Natural Areas and Zoological-Botanical Areas. As I mentioned earlier, the Coronado National Forest is one of the most biologically unique areas in the entire nation. Many outstanding areas on the Forest require formal protection from commodity development and recreational overuse. Yet you propose only slight additions to the existing situation. The first priority must be Zoological-Botanical Area designation for Guadalupe Canyon and the entire Cave Creek Canyon watershed. Cave Creek Canyon is a very special place with international scientific significance, but it has been adversely impacted by heavy grazing and recreational use. Designation of the entire watershed would begin to alleviate these problems and would nicely complement the recent expansion of the Chiricahua Wilderness.

4 My third major concern is the proposed level of timber harvest on the forest. The Coronado NF produces an insignificant amount of timber at great cost to the U.S. taxpayer and great environmental damage. I strongly urge you to reconsider the complete elimination of timber harvest from the forest. There is growing national sentiment opposed to the continuation of below-cost timber sales by the Forest Service, a view recently adopted by the Asst. Sec. of Agriculture in his Colorado decision. Alternative C, the maximum PNV alternative, not coincidently eliminates the commercial timber harvest from the Forest. This is common sense.

5 The Coronado is essentially a recreationally-oriented forest, and those alternative which emphasize resource protection and recreation provide the highest levels of local employment. In this same vein, I urge you to increase the proposed budget for trail construction and reconstruction so that trail mileage on the Forest does not decrease from neglect.

6 In conclusion, I strongly support the adoption of Alternative D as the Coronado NF Plan, with a large downward adjustment in or elimination of commercial timber harvest.

7 Please send me a complete copy of the final Coronado National Forest Plan and EIS when it becomes available. Where the Draft will be incorporated into the final, please send me immediately those documents which will not be reprinted (I only received a summary of the draft).

Thank you.

Sincerely,

Ken Goldsmith

Agency response to Kenneth Goldsmith

1. While we agree the Coronado National Forest is a "truly unique and a national treasure in terms of biological diversity and importance", we have to disagree with your assessment of National Forest management.

   The National Forest System is mandated by Congress to develop and administer the renewable surface resources of the National Forests for multiple use and sustained yield of the several products and services obtained therefrom.

   This basic mission is, therefore, one of conservation and wise use of available resources and not one of simple preservation.

2. Wilderness is but one of the resources to be considered in management of the National Forests. We agree the areas being studied for possible wilderness on the Coronado National Forest have few or no resource conflicts. However, there should be as compelling a reason to manage an area as wilderness as to not manage it as wilderness.

   Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

Agency response to Kenneth Goldsmith (continued)

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

Zoological and/or botanical areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the Plan, and others were considered as suggested by various respondents.

The Forest Plan would establish a zoological area for the Guadalupe Canyon watershed. It also would establish a zoological/botanical area for the lower portion of the South Fork of Cave Creek. These areas are already accessible so that public use and enjoyment of their values could be accommodated with the additional management direction prescribed for Management Area 14 of the Forest Plan.

Agency response to Kenneth Goldsmith (continued)

The upper watershed of the South Fork of Cave Creek is within a designated wilderness area. Management direction for this area (Management Area 9), is sufficient to give the needed emphasis and protection.

The Main Fork of Cave Creek would be managed for wildlife-oriented recreation opportunities as prescribed in Management Area 3. Additional special designations do not seem appropriate or necessary at this time.

We agree Cave Creek Canyon is a very special place, but can not agree it has all been adversely impacted by heavy grazing and recreational use. The few problems that have occurred would be rectified by the above proposed management.

4. We agree the Coronado National Forest produces an insignificant amount of timber at a cost to the U.S. taxpayer. We disagree there is great environmental damage. Alternative C does suggest that timber harvest is uneconomical when the administrative cost is directly compared to the value of the wood product itself. It should be noted that timber harvest as prescribed by the Forest Plan is done primarily to enhance wildlife and recreation values. Unfortunately, these values did not receive appropriate monetary consideration.

5. The Coronado is a recreation-oriented Forest. Although the proposed Plan does not significantly increase funding for trail maintenance, it does prioritize where limited available funding will be used. Also it emphasizes the use of volunteer help to get the total job done.

6. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives, as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

7. We previously sent you a copy of the Proposed Plan and Draft EIS which we hope you received. The Plan and EIS will be reprinted along with responses to all public comments. You will receive copies of these final documents.

Statement for Draft Coronado National Forest Plan. Richard J. Gordon, Box 1512, Juneau, Alaska 99802. August 21, 1985.

0235

Received Sep 2, 1985

Please include in your considerations as well as the formal hearing record the attached comments of mine for an earlier planning effort. Most of them still apply. Please consider particularly the points below.

I am extremely disappointed by the "small print" in your new Chiricahuas
1 proposal. In South Fork, I support the Zoological-Botanical Area proposal. I also think it is reasonable to retain the road, the permittee cabin leases (for now), and the campground. I recommend fencing off the campground area and South Fork trailhead, as off-road vehicles are doing a lot of damage there. (I have revisited the area in 1982 and 1984.) I most strongly
2 ask that you promptly eliminate all stock grazing within the area, now. It has no place in such a scientific area. I have seen lovely lush pocket meadows such as the one a little ways up the trail turned overnight into sparse pasture, its flowers and grass heads nibbled off. Whether or not sustained yield forage can be maintained is beside the point. The effect is to destroy the integrity of such places, heavily valued by birders, hikers, and others.

3 In main Cave Creek Canyon, I am disappointed that you dropped a formal Wildlife Management Area classification. This place really should be a National Park; to leave it without any formal designation is disgraceful. Whether or not the same management prescription is applied is beside the point - the formal designation would focus more public attention on it and reinforce good management.

In 1972, the District Ranger told me that the intent then was to phase out all grazing in the main canyon watershed when the old man who held the permit passed on. Yet now, you not only have not done this, but apparently proposed grazing apparently limited only by standard sustained yield and wildlife coordination requirements Forestwide. I recommend:

4
1. You spell out in the final plan precisely the grazing prescription for Cave Creek Canyon apart from Class 3 lands in general (not done in draft.)
2. That you commit as top priority use for current limited monies the fencing of areas, such as near research station, where erosion and poor forage growth still remain a real problem.
3. That you at long last establish the overdue policy to eliminate all grazing in all of Cave Creek Canyon. This need not be implemented at once, but as it can be fitted into the current permittee's livelihood. But the policy can be placed in effect now. There is such a high research as well as esthetic value to this watershed that grazing should have no place in it. Ask yourselves, where in Southeast Arizona is there any prime or even average grazing land in good condition yet closed to grazing? We need a few places like this, and Cave Creek Canyon must be one!

5
4. I support your apparent intent to acquire key private land here of recreational value. A detailed time plan should be spelled out so limited dollars don't keep on preventing it.

6 On top, I generally accept your plan, so long as fuel wood harvest is strictly limited to maintain the high esthetic quality, as around Rustler Park. But areas of sensitivity such as Barfoot Park should be closed to all commodity use, including being closed to grazing. You don't need to graze every last little meadow! How do you think it looks to the Boy Scouts, as well as visitors like me, when the Barfoot becomes a sloppy muddy overtrampled bog, instead of the aspen-fringed (sort of) flower park it ought to be maintained as. Surely that little bit of multiple use is not beyond your capability.

7 The USFS portion of the watershed south and west from Cochise Head needs to be given special protection to protect view for monument users below.

Statement for public hearing, April 29, 1972, on Coronado National Forest.
Richard J. Gordon, Cave Creek Ranch, Portal, Arizona 85632

Please include these comments, restricted to the Chiricahua Mountains, in the hearing record. I am taking this opportunity to comment on all aspects of forest management in the Chiricahuas, not merely on the undeveloped areas.

Forest and District staff both seem to be highly competent individuals, trying to do the best job possible. More funding, to provide more people, is needed on this district. Support from the Forest for a tougher enforcement policy is also needed.

8

KEY POINTS

Reduce grazing thruout area, eliminate in Cave Creek watershed.
Reintroduce fire as major management tool to restore forest ecosystem health.
Extend Wilderness to encompass Price and South Fork Canyons, and intervening ridges.

9

SIGNIFICANCE OF AREA

The portion of the Chiricahuas north of Tex and Bruno Canyons is of major national significance, primarily for its ecological diversity, including significant Mexican as well as Rocky Mountain floral and faunal elements. Pines, oaks, and understory are exceptionally rich and diverse. The finest variety of land birds in the U. S. occurs here. The large caldera remnant and volcanic formations makes the area of exceptional geological value. Variety of ecotypes within short distances due to factors such as slope, aspect, and drainage is unexcelled. Overall management policy should recognize that this area has the attributes of an outstanding national park, though the Forest Service is quite capable of managing it, if done with recognition of its exceptional and unique qualities.

10

MINING

Ray Russell's efforts on this Forest, supported by Supervisor Doran, have been outstanding. All efforts should be made to protect the bulk of the Chiricahuas from unnecessary scarring and damage, and the toughest possible access regulations should be enforced. Rumor has it that Phelps Dodge and Chiricahua Copper Company are looking over considerable acreages for staking claims. Such unrestricted, uncoordinated privileges must be controlled.

11

GRAZING

Many locations in this section appear to need better control. Rumor has it that the Arizona Cattle Grower's Association largely dictates numbers of cattle actually allowed on key allotments. I hope and trust that this is not the case. Local foresters say allotments are under control. Yet downward revision of some allotments due to recent drought reportedly have in places been ignored. Naturally some ranchers are barely getting along due to dry years. I have a deep admiration for this way of life; I only say that the forage resource on the Forest must be allowed to sustain itself, as top priority.

12 All grazing in South Fork (cave Creek) Canyon should be eliminated at once by building a fence and cattle guard across the canyon below the campground. This canyon is as unique and sensitive ecologically as prized McKittrick Canyon in Guadalupe Mountains National Park.

13 Plan to eliminate all grazing in the entire Cave Creek watershed, nationally significant for its exceptional scenery as well as its ecological diversity. Certain areas, such as those near the Research Station, are badly overgrazed. I commend you for seeing that new fencing has been installed, but those cattle will tend not to move from favored spots. Certainly Ralph Morrow should not simply be booted out; but an orderly long-range plan for grazing elimination is essential.

13 Notwithstanding provisions in the Wilderness Act, I do not think grazing, especially in such a small, accessible tract, is compatible with maintaining a Chiricahua Wilderness. Cattle should be kept off the high plateau, particularly since grass production is less luxuriant in these drier, less snowy years.

14 More stringent control of cattle numbers is needed in other canyons. Some Canyons are in fine condition (e.g. Price), but others seem badly beat up (notably Rucker). A fence and cattleguard should be installed at once in Rucker around the lower campground, since cattle milling and camping are not compatible.

Particularly sensitive or attractive areas should be fenced off, such as exquisite but heavily grazed Barfoot Park. Even if grazing does not exceed productive capacity, I think esthetic attractiveness, and maintaining meadows with climax and not merely invader species, should be a priority policy in certain places.

15 I commend you for cooperating in establishing The Research Ranch and closing the grazing allotment there, to maintain a research natural area. Consideration should be given to preserving and restoring selected grassy tracts on the Chiricahua, larger than the present exclosure plots.

TIMBER

16 Present timber policies overall seem quite adequate. The number of Christmas trees to be cut, and perhaps the location, will need to be more closely controlled as demands increase.

17 As Marshall demonstrates in his book, "Birds of the Pine-Oak Woodlands in Southern Arizona and Adjacent Mexico," an undesirable ~~increase in understory veget~~ation on the U. S. side is choking out the grasslands and increasing the danger of cataclysmic fires. I very strongly urge a program of controlled burning, starting on isolated Limestone Mountain, but eventually including the entire forest. If no other choice exists initially, brush in critical areas should be hand removed, and high priority given to funding this project.

WILDLIFE

18 Present policy of discouraging excessive predator control should be maintained. The relative abundance of cougars, and irregular presence of wolves and jaguars greatly increase the attractiveness of this mountain range.

19 I support the browse cutting policy in Rucker Canyon. But the general policy should be to maintain deer populations not exceeding the present (diminished) carrying capacity of the ecosystem.

20 I strongly recommend total hunting closure for unique mammal species in areas of high non-consumptive public visitation. You should press Game and Fish on this. Recently, a hunter simply slaughtered a number of Coati-mundis in South Fork Canyon, where people from all over the country go to see them. And a herd of semi-tame Peccaries was decimated last fall just outside the Cave Creek Ranch. This is very loose wildlife management. Non-consumptive users should have their primary use areas and rights, too. Last fall 3 [illegible] [illegible] [illegible] up [illegible]. This spring I have not even seen any whitetail.

TRAILS

21 A superb trail system exists here, and Pete Rawden and Louie Pope do what they can to maintain it. I encourage adequate financing and priority to maintain these trails. Part of the important Snowshed Trail, e.g., needs brushing. In general, it appears that too much expense is allotted to maintaining a few trails at unnecessarily high standards. More effort should be allotted merely to blazing and roughly brushing many more trail miles.

INTERPRETATION

22 The present Southwest forest campground guide shows five nature trails in this area, whereas actually there are none. The next edition of the guide should be corrected. Considering its uniqueness and increasing use, I encourage nature trails in Cave Creek Canyon and Rustler Park, habitats not represented in the National Monument.

WILDERNESS

23 It seems quite inconsistent to me, to allow helispots, cement water tanks, and above all grazing (however legal), yet remove fascinating old cabins, and fire towers. Grazing should be excluded entirely from the high plateau. If fire towers and cabins are torn down, all debris should be removed at once. Flys Peak, e.g., is much more cluttered than it was when the structures were standing.

24 Trail maintenance by power saw should be allowed, notwithstanding Wilderness Society policy (I'm a member, but never had a say). Trail maintenance is too important.

UNDEVELOPED AREAS

25 I urge that undeveloped areas in the Chiricahuas as shown on the recent Southwest forest map, be added to the too-small Wilderness. The whole Portal Peak area, as well as the Jones Peak area, are exceptionally wild and rugged terrain, deserving inclusion.

I strongly urge two small but key additions to the Wilderness, which are excluded in the undeveloped areas map: South Fork Canyon, which is wild as well as being unique, beyond a quarter mile upstream from the campground. And Price Canyon, a gem with its cypress, which is completely wild above Price Springs. These two indentations on the map should be removed, and the canyons made legal Wilderness.

26 I also urge strongly that all unroaded undeveloped areas in the main Chiricahuas, whether shown on the map or not, be kept undisturbed, perhaps as "back country," by formal policy.

INHOLDINGS

27 Good work in adding the key Camp Rucker property. In recreation areas such as this, where use conflicts exist, strong efforts should continue to acquire inholdings, perhaps with Land and Water Conservation funds. A prime example is Ralph Morrow's meadow, and other key properties in Cave Creek Canyon, where public use and valley viewing space is very limited.

28 Over a long period, cabin leases should be phased out, though you need not inconvenience existing leaseholders at present. No new leases should be written.

29 Addenda: On May 24, 1972, I hiked up to the meadow about 2 miles up the South Fork Cave Creek trail. This meadow has been developing a beautiful stand of green grass, and flowers despite the dry spring, the only such place in this canyon. This time, I found the grass and flowers gone, eaten down nearly to ground level. I am not saying there is overgrazing - as of now there isn't. I am saying that a place of exceptional beauty that is being visited by hundreds of birders and hikers has now been reduced to just another uninteresting clearing. I think such management is the antithesis of true multiple use.

Richard J Gordon

Agency response to
Richard J. Gordon

1. Thank you for your support of the proposed management for the South Fork of Cave Creek. Vehicle barriers will be installed in the South Fork Recreation Site in the spring of 1986 to prevent further damage to the area. Motorized vehicles will be restricted to existing roads.

2. The 762 acre Zoological/Botanical Area is part of an established livestock grazing allotment. Elimination of this portion of the allotment from grazing would require expensive and, we believe, unnecessary management practices such as fencing.

   Moderate, well-managed grazing has proven to be compatible with the riparian and other sensitive values in the Cave Creek Area. Both forks of the Canyon have been grazed for many years, and the areas are well-known as a showcase of riparian vegetation and unique birdlife. We agree that the unique resources of the area must take priority over production of livestock forage, but feel that it has been demonstrated that the two uses are not mutually exclusive.

3. We do not believe a formal designation for the Main Fork of Cave Creek Canyon is necessary or desirable at this time. As you point out, the management direction will emphasize wildlife and recreation resources. Future designations can still be made if appropriate.

4. The Main Fork of Cave Creek is a large area (9,000 acres plus) and involves more than one grazing allotment. The range management intensity will vary from Level A (no grazing) to Level D (intensive management) depending on the suitability of the particular area being managed. An estimation of acres by management level is shown in the Final Forest Plan for all of Management Area 3. Most of the Cave Creek Area will be managed at Level D. This will allow us to give priority to fencing or other management techniques to better control the livestock grazing as you suggest. As is the case with the South Fork of Cave Creek, we see no justification at this time to eliminate all livestock grazing. Moderate, well-managed grazing has proven to be compatible with the riparian and other sensitive values of this area.

5. A recreation acquisition plan has been prepared for the Chiricahua Mountains identifying private lands that should be acquired for public recreation purposes. The best these plans can do is establish priorities for acquisition. The Chiricahua area must compete for available land purchase dollars with other areas in the National Forest System. It would be futile to establish specific time lines and have to change them when the available funds go elsewhere. In the meantime, the Forest will pursue acquisition through the normal exchange procedures depending on the willingness of interested parties.

6. Wood harvest on the Coronado National Forest is used primarily to enhance wildlife and aesthetic values while providing recreational opportunities. This is especially true in the high country of the Chiricahua Mountains. While we can not agree that areas such as Barfoot Park and Rucker need to be entirely closed to uses such as livestock grazing, we certainly agree these uses must be closely regulated to prevent low quality experiences as you mention.

7. We believe the proposed management direction for the area around Cochise Head will provide adequate protection for the scenic values. The area has limited suitability for most uses other than nonmotorized recreational opportunities.

8. Please see responses 2 and 4. We are now using fire under prescribed conditions to restore and maintain health of various ecosystems. This use will be continued and increased. The 1984 Arizona Wilderness Act added 69,700 acres to the existing 18,000 acre Chiricahua Wilderness. These additions included appropriate portions of the areas you mentioned.

Agency response to
Richard J. Gordon
(continued)

9. We believe management direction in the proposed Forest Plan recognizes the many values of the Chiricahua Mountains. We appreciate your support of our management capabilities.

10. We are sure Ray Russell and Clyde Doran would appreciate your support of their past efforts. We assure you that we intend to carry on that tradition of concern for the land of the Chiricahua Mountains and the rest of the Coronado National Forest.

11. The numbers of livestock allowed on each allotment are determined through analysis of the forage resource capability of each area. This analysis also takes into account forage needs of resident wildlife species. Numbers of livestock are adjusted up or down depending on the capability determinations. Normal drought years are taken into account by the conservative estimates of forage use that southwestern plant species can tolerate.

12. Please see response number 2.

13. Please see response number 4.

14. Please see response number 6.

15. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

    Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

    We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

    It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

16. Timber harvest is still used to enhance aesthetic recreation and wildlife values. Increasing demands for products such as Christmas trees have been recognized. The Coronado National Forest can not meet total demand for some products. Harvest will be within sustained limits to emphasize the above values.

17. We agree that grasslands have been invaded by woody species. In the past few years, the Coronado National Forest has increased the use of fire to reduce these invasions and to meet other resource objectives. In fact, Limestone Mountain has received two prescribed burns in the very recent past.

Agency response to
Richard J. Gordon
(continued)

18. Predator control is exercised by State Game and Fish Departments to protect wildlife and by the U.S. Fish and Wildlife Service for livestock protection. The Coronado will cooperate with these agencies following existing executive orders and regulations.

19. Our intent is to stock all ecosystems within their carrying capacities whether it be deer, livestock, or a combination. As you are aware, the Forest Service must work with the State Game and Fish Departments to adjust numbers of wildlife species.

20. At this time we see no need to recommend prohibiting hunting in South Fork of Cave Creek. Enforcement of current State law regarding use of firearms and hunting should be sufficient to provide Forest user safety and protect wildlife resources. We will be monitoring this activity and make appropriate recommendations as necessary.

21. We agree. The proposed Forest Plan gives additional emphasis to trail maintenance. Because of anticipated funding shortages, the Coronado Forest is relying heavily on the use of volunteers to get the needed maintenance done. Intent of the Forest Plan is to maintain most trails to a standard that provides for public safety and minimum user convenience. This standard will accommodate users with an intermediate experience level. Others will be maintained at higher or lower standards depending on the experience opportunity to be provided to the users.

22. We agree. Management direction for Cave Creek, especially the South Fork, provides additional emphasis on interpretation and education of the resources. We will consider the same thing for the Rustler Park area.

23. We agree that all debris should be cleaned up when structures are removed. The amount of livestock grazing in the high country of the Chiricahua Mountains will be minimal.

24. Although it would be helpful to use power saws to maintain trails in wilderness areas, the Forest Service believes the integrity of the wilderness experience should be upheld by prohibiting the use of motorized equipment except in emergency situations.

25. Please see response number 8.

26. Remaining roadless areas are not a separate management category at this time, but are managed under the concept of multiple use which considers both commodity and amenity values. The Forest Plan does emphasize retention of nonmotorized recreation opportunities. This emphasis and the limited amount of development planned should retain the roadless character of most of these areas.

27. Please see response number 5.

28. The existing summer homes (recreation residences) have been authorized by special use permit. There has been some concern about phasing out these summer homes. The Forest Plan provides for continuation of the permits not already on tenure for the Plan period (10 - 15 years). These summer homes on the Forest may be subjected to a separate tenure analysis to determine whether the permits should be continued or phased out based on a higher priority need. However, permit holders must get at least ten years notice of pending phase outs.

29. Please see response number 2.

0016

THE GREAT BEAR FOUNDATION
P.O. Box 2699
Missoula, MT 59806
(406) 721-3009

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 5 1985
RECEIVED

July 31, 1985

Mr. Robert B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tuscon, AZ 85701

Re: Proposed Coronado Forest Plan

Dear Mr. Tippeconnic:

Thank you for sending a copy of the Proposed Coronado Forest Plan and associated documents. We appreciate the time and effort you and your staff have put into planning for the Coronado National Forest. The Great Bear Foundation comments below will be limited to selected issues with relevance to bears.

In general, except for proposed astrophysical facilities on Mt. Graham, Alternative D would best serve the needs of wild bears. Alternative D would also involve low cost to the taxpayer. Other, more capital-intensive management alternatives would generally be disadvantageous to bears.

1 More specifically, livestock grazing now exists at levels disadvantageous to bears on the Coronado National Forest. Particularly in spring, bears and livestock often compete for the same acreage and the same plant foods. Since food limits animal populations, foods taken by one species are a limiting factor for another species. Further, livestock-caused damage to riparian areas limits the value of those areas to livestock and bears alike.

We regularly observe that Forest Service actions which reduce the spectrum of survival opportunity for bears also cause other problems. Livestock grazing on the Coronado National Forest seems to be a causal factor aggravating two problems in addition to the problems for bears. You have a duty to examine these problems and to display them for public review in the Final DEIS if the hypotheses immediately below are accurate to any degree or extent.

2 Livestock grazing hypothesis #1: Livestock grazing can reduce ground cover, causing increased runoff.

With increased runoff, erosion is increased. Water quality can be affected accordingly. Thus, livestock grazing can be pitted against water quality as a consequence of reduced vegetation or ground cover. We will have more to say on this matter, later in this comment.

3 Livestock grazing hypothesis #2: Livestock grazing can affect the livestock industry adversely, through depression of price, when the range is overstocked.

Board of Directors
Arnold Bolle • William Callaghan • Craig Campbell • Lance Olsen • Frank Ponikvar • Phil Tawney • Mart Williams

You certainly know that price is now a major factor affecting the viability of many livestock operations. Depressed prices are in part due to overproduction, leading one rancher to observe that what the livestock industry really needs is for an area the size of Texas to be taken out of production if ranchers are to get the price they need in order to survive; His comments appear to make sense and appear to be supported by USDA data; Recent news releases by USDA say that, as commodity prices drop, land values also drop, so that ranchers have reduced borrowing power as a hedge against current problems. The net result can be that ranchers are forced to sell, at a time when other, neighboring ranchers can not afford to buy, and open lands now used as ranchlands can fall to land developers who subdivide the land for sale as recreational property. Subdivision is, of course, a threat to wildlife including bears. This result may thus drive ranchers and bears alike off the land, and has serious biological and socioeconomic implications that you have a duty to examine in your Final DEIS. The basic assumption is that overproduction (e.g., overstocking) can depress price and can thus trigger a logical sequence of events leading to rancher bankruptcy and subsequent subdivision. The hypothesized effect is that overstocking can work against the best interests of wild bears and agriculture alike.

You should look into these two hypotheses and, to any extent they are supported
by evidence, you have a duty to report them in your Final EIS. It is contrary
to the purposes of the Forest Service to take actions causing multiple adver-
2 sities such as those we hypothesize above; There is nothing in the multiple use
concept that justifies multiple hardships. If livestock overstocking causes
problems for bears, water, and livestock prices alike, your grazing decisions
appear to need serious evaluation.

The need for reduced stocking of livestock is already evident for the Coronado
National Forest. The ramifications for wildlife are fairly clear in the
Proposed Plan and DEIS. The ramifications for water quality are not adequately
3 explicit. The ramifications for the livestock industry (i.e., price depres-
sion) remain unexamined.

Sincerely,

Lance Olsen
President

sc

Agency response to
(The) Great Bear
Foundation

1. The Coronado Plan recognizes that grazing exists at a level of stocking and management that exceeds the capacity of the land in some areas. This could conceivably effect the quality of bear habitat, particularly in areas where competition for spring feed is significant. The plan proposes to achieve a balance between capacity and stocking rates sometime in the second planning period. Bears and other wildlife species will be given consideration in the allocation of forage on all grazing allotments. The plan further recognizes that some riparian areas are currently deteriorating from livestock use, and proposes solutions to this problem. Your support for these management incentives is greatly appreciated.

2. Any trained land manager would agree with your general hypothesis that livestock grazing can reduce ground cover and cause increased runoff. That, however, only applies when overstocking or mismanagement is evident. Well-managed, moderate grazing as contemplated in the Coronado Plan is not expected to have adverse effects on the watershed, but rather improve watershed conditions over time.

3. You raise some interesting points about grazing fees and the economics of the livestock industry, most of which are outside the scope of this plan. A joint report of the Forest Service and the BLM addressed these issues in 1985, and Congress will make a decision concerning federal grazing fees.

0206

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 30 1985
RECEIVED

PO Box 1803
Socorro, NM 87801
August 27, 1985

Forest Supervisor
Coronado National Forest
300 West Congress
Tuscon, Arizona 85701

Dear Sir:

I have reviewed the Coronado National Forest Plan and the Draft Environmental Impact Statement for the Proposed Action and other alternatives. Thank you for providing me with a copy of each.

1 First I will comment on the proposed Mt. Graham astrophysical site and wilderness study area. I favor the proposed action alternative. Science is a valuable tool and I believe research and forest management can work together. I worked for several years at Langmuir Laboratory in the Cibola National Forest near Socorro, New Mexico. I did not encounter many conflicts during the time I was there. I believe that the actual scientific site should be limited to a fairly small acreage. Power needs to be supplied for the facility to function at an optimum level. Management of the site could possibly be shared with the employees, especially if there was on-site housing.

2 In regard to the remainder of the forest plan, I favor alternative C. Acomment was made in the DEIS that the wilderness boundaries were adjusted to eliminate most concerns of the public and management. It does not seem to me that there are any real conflicts with this alternative. If the areas can be feasibly managed and the public is satisfied, why shouldn't this alternative be implemented?

Even though the ecosystems of the Bunk Robinson and Whitmire areas are already represented in designated wildernesses, I think it is still a good idea to include these areas. It seems that if only one such ecosystem is wilderness then the area is unique and would require special protection beyond that of a wilderness. If there are two or more special unique areas, the protection of one is not as critical.

3 I feel that the proposed grazing levels in alternative C are much more realistic as far as what the land can handle. I am against the range levels D and E, detailed in the forest plan. I do not think the land should be used to even 90% of its capability. I do not believe intensive practices such as seeding and watershed improvements will support such high levels of grazing. I do not feel that

3 special improvements should be made for additional grazing. I favor the forest being used as is.

4 I do not feel that designating an area as wilderness hinders wildlife management. In my opinion wildlife management in a wilderness should be non-existent. The forest no longer is in its natural state if the animals, plants, and people are all being managed.

2 Overall, the boundaries in alternative C seem more manageable than in alternatives D and E. C also provides a reasonable amount of wilderness area, more than B or the proposed action. I favor the BLM study areas as wilderness which alternative C also provides.

Sincerely,

Deb Hall

Deb Hall

Agency response to Deb Hall

1. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last for at least ninety days as was the case with the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

2. We agree the wilderness boundary adjustments for Bunk Robinson and Whitmire Canyon as shown in Alternative C do eliminate most resource and management concerns.

   Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by the proposed management of these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

   The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the

Agency response to
Deb Hall
(continued)

the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through the management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private lands within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. On lands where grazing is a significant use, we have proposed the highest practical level of grazing management. The Forest Plan does not include any Level E management, because of budget limitations and environmental considerations. This shows our agreement with the idea that widespread use of this management intensity is not compatible with other resource goals. We have prescribed management Level D for 44 percent of the Forest. Currently 64 percent is managed at Level D. This will allow us to concentrate livestock grazing on the most suitable areas of the Forest and reduce grazing on the less suitable areas. Level D management provides more options, including fences, waters, and reseeding, for intensively managing livestock than does Level C, thereby minimizing impacts to other resources while utilizing the available forage resource. Levels C and D management do not imply utilizing 90 percent of the forage the land can produce. Rather it means utilizing 90 to 100 percent of the land area that is determined to be suitable for livestock grazing. The average use level for the forage itself is only 35 to 55 percent under Level D management.

4. Most professional wildlife managers do not share your belief that wilderness is best for wildlife. A few wildlife species require relatively undisturbed conditions, but most are quite adaptable to man's activities. When we place a wilderness designation on an area of land we greatly limit options for wildlife management. In some cases this results in less animals due to a lack of water or some other critical habitat component.

0001

CORONADO N. F.

MAY 31 '85

5-21-85

I wish to comment on the Bunk Robinson WSA and the Guadalupe Canyon ISA being studied by the Coronado National Forest in conjunction with the BLM. I have just finished reviewing the New Mexico statewide draft EIS for 37 WSA's. I also have an interest in the Guadalupe Canyon/Bunk Robinson area.

I have been in the Pelloncillo Mountains which are included in the national forest and consider them a unique area. The vegetation there is not found anywhere else in New Mexico. Many species of birds have a northern limit of the Guadalupe Canyon area.

Making both areas wilderness would enhance management because of common boundaries.

In my contact with the ranchers around Cloverdale, I believe they have very nearly come to consider the National Forest as there for them. It is true that the use level is not high and I don't believe it would increase very much if part of the forest was designated wilderness. I don't think any ranching operation would be damaged by a wilderness area. It might help them remember that the wilderness isn't just for the cows, but for other people to enjoy also.

I do not have a map which shows specific boundary lines of the two areas. I am in favor of designating both areas entirely as wilderness.

Perhaps you could inform me about the status of the study areas.

Thank you for your attention.

Sincerely,
Deb Hall
Deb Hall
PO Box 1803
Socorro, NM
87801

Agency response to Deb Hall	Please see our response to your letter dated August 27, 1985.

Walton Hawk
Box 40
San Cristobal, NM 87564

Oct. 6, 1985

0695

Forest Supervisor
Cornado National Forest,
300 West Congress,
Tucson, Arizona 85701

Dear Sirs:

I wish to comment on your Summary of The Draft Environmental
Impact Statement for The Coronado National Forest Proposed Plan.
I do not know enough about the Coronado Forest to make specific
sujestions. I have been in Cave Creek in the Chiricahuas and drove
1 thru the Peloncillo Mountains. I believe that the whole watershed
for Cave Creek, not just South Fork, should have special management
to preserve its unique, native vegetation and fauna. I generalley
support your proposed alternative. I appreciate that your plan does
not emphasize timber production at the expense of other uses like
the Forest Plans for this area do.

I believe that vegetative manipulation should be kept to a
2 minimum and that non natives should not be used in Wilderness areas
even after fires. I believe that a basic use for Wilderness areas
that is not stated often enough is present and especialley future
study of natives and how they progress without the interferance of
man. I wonder why the Bunk Robinson WSA is not being proposed for
3 inclusion in the Wilderness System especialley with the ajascent
BLM roadless areas. It is unique for the state of New Mexico. I
believe that protection of the resource should be the primary goal
of Forest Plans and that keeping people and especialley vehicles
4 on maintained trails and roads furthers protection; so more funds
and effort should be directed to this end. I believe that the
need for more roads must be carefully studdied, and that they
should not be built until the present ones can be well maintained.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 9 - 1985
RECEIVED

Sincerely:
Walton Hawk

Agency response to Walton Hawk

1. The Coronado Forest Plan recognizes the uniqueness of the Cave Creek watershed and prescribes management aimed at protection of the distinctive flora and fauna of the entire canyon. Management direction is provided in Management Areas 3 and 14 of the Forest Plan.

2. The intent of the Forest Plan is to keep vegetative manipulation to the minimum necessary to meet the stated resource objectives. Although we agree that native vegetation should be emphasized in wilderness areas, there may be situations calling for the use of nonnatives in order to protect basic soil resources as well as resource values in other areas. Normally these nonnatives are species already naturalized to the general area. For example, grasses such as orchard grass, have shown to be effective in stabilizing soils at the high elevations found in many wilderness areas. These are generally available on short notice whereas native seeds may not be available in the short time frame to establish a ground cover after fires.

3. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wildernesss experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

Agency response to Walton Hawk (continued)

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wildernss areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

4. The proposed policy for managing motorized vehicles will continue to allow their use on existing roads and trails. Motor vehicle travel off roads or trails will not be allowed except by permit. Signing will take approximately three to four years to complete. Enforcement of the policy will take place as signing is completed. Road management emphasis will be on maintaining and reconstructing existing roads. Before any new road is constructed, it is subjected to a site specific environmental analysis. The Plan predicts only ten miles of road will be needed to manage fuelwood stands. We are unable to predict the need for mining activity roads. These roads often provide additional recreational opportunities.

0024

6120 Santa Valera,
Tucson, AZ 85718
August 1, 1985

Coronado National Forest,
300 West Congress,
Tucson, AZ 85701

Gentlemen:

Many thanks indeed for sending us a copy of your Summary of the Draft Environmental Impact Statement for the Coronado Forest. We have read it with great interest, and we appreciate very much the conscientious way you have approached your really knotty problems.

Since you ask, the following comments and suggestions are respectfully offered.

1) Our principal interest is hiking and camping, mainly in the rough terrane near Tucson and in the high-elevation forests of Mount Graham and the Chiricahuas.

1 2) The problem that bothers us the most is the lack of access to some of your best trails in the Catalinas. The trail up the west side of Pusch Peak is cut off, and the approach to Ventana Canyon looks as if it was going to be cut off at any time.

2 3) Developing astronomical sites or TV towers is too bad, but it isn't reasonable to try to block things like this.

3 4) We have no objections to offering grazing rights to parts of the Forests that are relatively remote. However, we would hope you could restrict logging as far as possible, as it takes such a long time for our ponderosa forests to rejuvenate themselves, after logging.

Again, many thanks for sending us your report.

Yours sincerely,

H. E. Hawkes

H. E. Hawkes

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

AUG [illegible] 1985

RECEIVED

Agency response to
H. E. Hawkes

1. Lack of access to the Forest by both trail and road is a Forest-wide problem. We consider it a high priority item. Trailhead access to the Pusch Ridge Wilderness has been a particular problem and much progress has been made in working with Pima County and private landowners. There is no designated trail up the west side of Pusch Peak. There are no plans to develop one because of concerns with management of the desert bighorn sheep. Access to the west end of Pusch Ridge is provided by the Linda Vista Trailhead Parking Area.

   The Catalina State Park provides access to the northwest side of Pusch Ridge Wilderness via the Romero Canyon Trail and the Sutherland Trail in Cargodera Canyon. Trailhead parking and access to the Ventana Canyon Trail has been provided by the private landowners in their parking facilities. Additional negotiation is underway to provide separate public trailhead parking.

2. Special uses such as astronomical sites and TV towers are authorized by the Acts of June 4, 1897 and March 4, 1915. Proposals for these uses are subjected to an environmental analysis the same as proposals for any other appropriate resource use of the National Forests.

3. Since livestock grazing is a legitimate use of the National Forest resources, applications for grazing permits are considered for any lands determined to be suitable for this use, regardless of remoteness.

   Harvest of timber resources is done only on lands considered suitable for that purpose. Suitability requirements include a determination that adequate regeneration can be achieved within five years after harvest. Regeneration will normally be accomplished through natural means. In situations where adequate moisture and a seed source do not coincide, planting of native trees may be used to supplement the natural seedlings. Timber harvest on the Coronado National Forest is done primarily to enhance wildlife and recreational values.

1925

DOUGLAS RANGER DISTRICT
Received 6-14-85

0004

State of New Mexico
HIDALGO COUNTY
300 S. SHAKESPEARE
Lordsburg, New Mexico 88045

June 10, 1985

Mr. Bernard H. Brunner
District Forest Ranger
Rt. 1 Box 228R
Douglas, AZ 85607

Dear Mr. Brunner,

The Hidalgo County Commission offers the following comments concerning the Coronado National Forest Wilderness Study area located in southern Hidalgo County:

1. The Commission does not support this area being designated a wilderness area because there would be nothing to be gained in such a designation at this time. A wilderness designation at this point is detrimental to the main economy in that area, i.e. cattle ranching.
2. As a recreational area, back-packing, horseback riding, etc., is accommodated as the area is listed now.
3. We have not been informed of any endangered species in need of protection in that area.

Please contact the Office of the County Manager if you have any further questions.

Sincerely yours,

HIDALGO COUNTY COMMISSION

Chairman

Member

Member

CORONADO N. F.
JUN 26 '85

The Southwest Gateway To The Land Of Enchantment

Agency response to Hidalgo County Commission

The Forest Plan does not recommend a wilderness designation for the Bunk Robinson or Whitmire Canyon Wilderness Study Areas. It does recommend a zoological designation for part of Guadalupe Canyon. We feel management as prescribed in the Forest Plan will provide for a variety of resource activities while maintaining wildlife values.

We are not aware of any federally listed threatened or endangered species in the Peloncillos, other than occasional visits by Peregrine Falcons and Mexican Wolves; but many species listed by the State of New Mexico occur in the area. You might want to review a recent publication by the New Mexico Department of Game and Fish entitled Handbook of Species Endangered in New Mexico. This booklet lists about 37 species for Hidalgo County, most of which are found in the mountains.

4282 N. Limberlost Pl.
Tucson, Ariz. 85705

October 24, 1985

0724

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 28 1985
RECEIVED

Mr. R. B. Tippeconnic,
Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

I am sorry to be late with my comments on the Summary of the Draft Environmental Impact Statement for Coronado National Forest Proposed Plan but I have been traveling for several months and only recently returned.

1 I have read the Summary and after some study I believe that Alternative D is perhaps the most conservative on the environment yet allowing for astrophysical development. Alternative D would allow a substantial increase in new campsites but limit motorized vehicles to designated roads and trails only.

2 I do have a question regarding the power corridor to be cut thru the wilderness for the astrophysical development. Is this for electric lines? If so, this corridor could be completely eliminated if wind power was utilized on the windy, high exposed area needed for this development. This method of obtaining energy is being used in mountainous, inaccessible areas in Europe. There is also solar energy which most certainly could be used here in Arizona.

3 In reading the Summary, these questions come to mind:
1. Why must the Forest be kept open to possible future mineral explorations and development? There has never been a mining operation or exploration that didn't scar the earth. No matter how carefully it is done, the disturbed area will never again have its natural beauty, and watershed is often contaminated from the mining operation. What must we do to restrict or withdraw our Forest from mineral entry?

4 2. Is it feasibly possible to capture rain water or snow melt in some sort of storage for use for Forest activities (not livestock)?

5 3. On page 6, the paragraph on Fire Management comments on decrease in wildlife habitat because of fire control. Last spring, a "controlled" fire was set on the backside of the Catalina Mountains. It burned for about a week and left the beautiful green mountainside in a deplorable condition. My Grandsons and I hiked over a part of the area several days later and found to our dismay, the carcasses of any number of new-born or very young creatures and birds. In the spring seems like a most unlikely time for a burnoff if wildlife is important to the forest - which I believe it is.

During the burnoff, the air pollution in the whole valley behind the Santa Catalinas, was almost unbearable for about a week. Since that time, the erosion has been tremendous in that area. After a heavy rain, the topsoil and silt is carried away to the lowlands. Somehow, I feel great improvements can be made in the Fire Management area.

I shall go to the library and review the Proposed Plan.

Yours truly,

Helen Hiemstra

Helen P. Hiemstra

Agency response to
Helen P. Hiemstra

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives, as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. The power corridor you refer to is a 500 foot strip on the southwest side of Mt. Graham that Congress did not include within the Mt. Graham Wilderness Study Area. The corridor was suggested by the proponents of the astrophysical development for the purpose of taking electrical power to the top of Mt. Graham. Although the power need was identified by the astrophysical proponents, other ultimate users may include electronic users now on Heliograph Peak and the Coronado National Forest. The question of power needs and whether the corridor is needed will be addressed in the EIS being prepared for the proposed Mt. Graham Astrophysical Area.

3. Minerals are fundamental to the Nation's well-being. The National Forest System by coincidence of geology and geography is a principal storehouse of minerals and energy. The search for and removal of minerals and energy resources are authorized uses of the National Forest System, to be encouraged and facilitated in accordance with the National Mining and Mineral Policy Act of 1970 and conducted in the public interest.

   The Forest Service objective is to carry out the mineral management mission in a fair and timely manner, consistent with multiple-use management principles, to integrate the exploration, development, and removal of mineral and energy resources with the use and conservation of other resources. The Forest Service will through appropriate regulations and plans of operation, seek to minimize adverse impacts to other resources while fulfilling our mandate to foster mineral development.

   Requests to withdraw public lands from mineral entry or activity have to be made through the Bureau of Land Management. The requests have to meet certain stipulations as provided in the Federal Land Policy and Management Act of 1976. Basically, there has to be an overriding need to withdraw the land for such things as protecting investments in recreational facilities or protecting sensitive natural resources. All wilderness areas are automatically withdrawn from mineral entry, with the exception of valid mineral rights existing prior to December 31, 1983 or prior to the date of wilderness designation, if later.

Agency response to
Helen P. Hiemstra
(continued)

4. The Forest Service and others have been using the concept of capturing and storing precipitation for domestic use and wildlife and livestock use for many years. The concept consists of building small artificial watersheds from metal, concrete, plastic, etc., to capture and funnel the water into storage tanks. The water is then diverted to individual drinkers or troughs. These "trick tanks" have proven to be very effective as alternatives to more permanent water sources. They haven't been used to date by the Agency for recreational uses because of the cost and problems associated with assuring high quality standards. They certainly do have possibilities.

5. The reference to "...decrease in wildlife habitat because of fire control." may be a little confusing. This refers to that past practice of strict "control" of all natural fires which has created some unnatural conditions in the current habitat. Fire is a natural part of the environment and prior to our intrusion, the diversity of habitat was greater than currently. One of the functions of prescribed fire is to create or restore this balance of diversity. The intent of our statement is that control is not always the answer and "management" of resources may require use of prescribed (controlled) fires to accomplish our objectives.

   As part of our fire management program, we monitor and evaluate each prescribed fire. Your evaluation had three primary areas of concern: a) wildlife deaths, b) air pollution, c) soil erosion.

   a) The burning is done in the spring for a number of reasons. Conditions, such as temperature, wind, etc., are more favorable at that time. These factors help to create a "cooler" fire as opposed to the same occurrence in mid-June. Survival of small mammals depends upon uniformity, intensity, size and duration of the fire. Since most rodents live in burrows beneath the soil surface, they are well insulated from the heat. In a burn such as the one on the Catalinas a "patchy" condition exists now with some burned and some unburned areas and the wildlife habitat from an overall standpoint has been improved. In monitoring this project we are not aware of carcasses of "new-born or very young creatures and birds."

   b) Your comments about air pollution are valid. As part of the prescribed fire management process we assess the potential smoke impacts. Air pollution potential is based on the relative ability of the atmosphere to dilute and transport pollutants. A high potential per unit of pollution results from low dilution rates and little transport by the wind. This basically means that if the air mass does not allow the smoke to rise, as it would on a warm day, and there is little or no wind to transport the smoke--a problem could occur. We utilize current weather forecasts and on-theground predictions. On rare occasions unpredicted weather changes can occur. For instance, a cloud cover not forecasted nor anticipated, could create a short-term smoke problem. We take all precautions possible and understand and agree with your concern.

   c) Monitoring has not indicated any significant soil movement. Conditions in the spring are favorable to less intense burns, which cause little effect on the existing soil conditions.

0685

OCT 5, 1985

SUPERVISOR
CORONADO NATIONAL FOREST
300 W. CONGRESS
TUCSON, AZ

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 8 - 1985
RECEIVED

DEAR SIR:

I'D LIKE TO COMMENT ON THE DRAFT EIS FOR THE CORONADO NATIONAL FOREST. THE PROPOSED ALTERNATIVE IS LACKING IN ITS PROTECTION OF ROADLESS AREAS.

IT MAKES A LOT OF SENSE IN THIS AGE OF FAST DISAPPEARING BACK COUNTRY TO TRY TO PROTECT AS MUCH OF THE ROADLESS PUBLIC LANDS THAT ARE LEFT. ALTERNATIVE "D" IS THE PROPER WAY TO GO HERE. AS YOU NOTE, ONLY 20% OF THE CORONADO IS PROTECTED NOW AS DESIGNATED WILDERNESS. THAT IS NOT ENOUGH FOR A STATE GROWING AS FAST IN POPULATION AS ARIZONA.

SINCERELY

SIDNEY M. HIRSH
4322 E. 7th ST.
TUCSON, AZ 85711

Agency response to
Sidney M. Hirsh

Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

Remaining roadless areas on the Coronado National Forest were not considered for wilderness designation as part of this planning cycle. The proposed Forest Plan emphasizes retention of nonmotorized recreation opportunities.

Agency response to Sidney M. Hirsh (continued)	Due to this emphasis and the limited level of development planned, these areas should remain essentially roadless and can be studied for wilderness suitability in the future.

0065
August 11,1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 1 1985
RECEIVED

Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson,Az. 85701

Dear Sir:

I have completed a review of the "Draft Environmental Inpact Statement for the Coronado National Forest Proposed Plan". For the most part, the proposed action is preferable, in my opinion, to the alternatives described.

Fuel Wood:

1 An exception to the proposed action is that pertaining to firewood. I personally am opposed to increasing access roads for fuel wood harvest and would prefer alternatives C and D. The public will be better served if funds are expended improving and increasing hiking trails rather than on fuel wood access roads.

Recreation:

2 I am strongly apposed to permitting any off road vehicular traffic excepting in a life threatening emergency situation. All vehicle use should be restricted to some of the existing roads as in the proposed action.

Mt. Graham Astrophysical Proposal:

3 The proposed action, development of 30 acres for exclusive use and limited restrictions on 3470 acres for the development of an invaluable astronomical resourse, is for the public benefit. This benefit is of more importance than a campers privilege to build a campfire or drive a vehicle after dark. Every effort should be made, however, to minimize the effect on national flora and fauna populations.

It is hoped that the above comments may be of some benefit to you in your preparation of the final plan and impact statement.

Sincerely,

Samuel Hodesson

Samuel Hodesson,DVM,MPH

Samuel Hodesson, D. V. M.
6841 Camino de las Brisas
Tucson, Arizona
85704

Agency response to
Samuel Hodesson,
D. V. M.

1. Fuelwood harvest on the Coronado National Forest is an activity used to meet other resource objectives such as providing recreational opportunities and providing wildlife habitat. Some access roads are necessary to manage the stands to meet these resource objectives. Only ten miles of roads are planned during the Plan period.

2. The Forest Plan would continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORV's or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

3. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case with the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0370

Supervisor Office
Coronado National Forest
300 West Congress St
Tucson, Arizona 85701

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 16 1985
RECEIVED

Thank you for sharing your proposed Draft Impacts and Review of impact of the Proposal + alternatives

After reviewing the literature we Steadfastly Support alternative D as the only way far sighted plan for our future. Business ventures invading into the forest must concern all tax paying citizens in decades to come.

Thank you.

Sincerely,
Vonnette J Howell
Harold W Howell

Agency response to
Vaunetter J. and
Harold W. Howell

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

Huachuca Hiking Club
Sierra Vista, Arizona

USDA Forest Service
FB #42
300 West Congress
Tucson, AZ 85701

0665

Dear Mr Tippeconnic:

The Huachuca Hiking Club is pleased to review and comment on the Proposed Coronado National Forest Plan. We make extensive use of the Forest for hiking, backpacking, and camping. Additionally, we work with your Sierra Vista office in the Adopt-A-trail program to perform trail maintenance in the Huachuca Mountains.

- Strongly agree with restricting motorized vehicles to designated roads and trails in the Forest.

1 - A limited size Wilderness Area for Mt Graham is desirable to complement the other multi-use areas on Mt Graham.

- Very strongly urge the emphasis on right-of-way acquisition action to insure access to the Forest. Actual development of roads should be based on future needs and funds.

- Agree with controlled fire management as opposed to no fire management.

2 - Hiking Trails - The plan doesn't mention support for volunteer trail maintenance programs. Our experience has shown that this is a good way to accomplish the light maintenance work (brush cutting and minor trail tread repair), however it does entail Forest Service support to obtain and effectively use this volunteer resource.

In general, we support your proposed action plan for the Coronado National Forest.

Sincerely
John Staples
Huachuca Hiking Club

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
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Agency response to Huachuca Hiking Club

1. The Forest Plan now recommends a wilderness designation for all 62,000 acres of the Mt. Graham Wilderness Study Area. Our analysis now indicates there are no conflicts between this wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development.

2. We regret you did not find the references to continued use of volunteers to help maintain trails and do other jobs in the Coronado National Forest. We deeply appreciate the help all organizations and individuals have given us through the years and plan to continue the volunteer programs as long as anyone is interested. See pages 33 and 46 of the Draft Forest Plan.

0644

CORONADO N. F.

OCT 11 '85

Action X		Action X		Action X		Action X	
Info ✓	Init	Info ✓	Init	Info ✓	Init	Info ✓	Init
FS		RES		LA		D	
LMP		E&F		ARCH		N	
AO		PER		WL		SV	
ENGR		AS		WS		S	
RBE		CS		SLS		SC	
RLT		LE		DISP		NARTC	
FIRE		RECP		PIO/IS		COMM	

DEAR SIR:

I AM CONCERNED ABOUT PRESERVING THE BEAUTY
AND WILDERNESS OF ARIZONA. I WOULD LIKE TO SEE
1 WILDERNESS STATUS GRANTED TO ALL ACRES OF THE THREE
WILDERNESS STUDY AREAS (Mt. Graham, Bunk Robinson, and
Whitmore Canyon). ALSO THE ADDITION OF BAKER Canyon
2 and Guadalupe Canyon to the Wilderness Area. I am
opposed to the Mt. Graham Observatory and would like
3 to see the end of overgrazing. I am opposed
4 to any new roads built to access fuelwood and
5 am in favor of restrictions on 4 and 3 wheeled vehicles
6 within the Forest. I support the preservation of portions
of all ecosystems in special area designations (wilderness,
RNA's, ZBA's; Protection of riparian habitats and
7 improved monitoring of the health of various ecosystems.

Thank you for your time

Scott Hudson
4115 E. INDIAN SCHOOL # 231
Phoenix, AZ. 85018.

Agency response to Scott Hudson

1. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by the proposed management of these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through the management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private lands within and adjacent to the WSA.

Agency response to
Scott Hudson
(continued)

Specific management direction would be determined through regular BLM planning procedures.

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The comment period will be at least ninety days as it was for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

3. We agree with you that it will be necessary to temporarily reduce grazing while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the First Period and 338,000 in the Second Period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about ten percent less than present. Any future increases in livestock numbers will be based on increased capacity as you suggest.

4. Fuelwood harvest is an activity used to achieve other resource objectives. In order to manage the stands to meet these objectives, such as meeting wildlife habitat needs, adequate access is needed. These access roads often provide other recreation opportunities for the public. New road construction is projected to be less than ten miles during the plan period.

5. The purpose of the Forest Plan policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle usé would be permitted on established roads and trails.

6. Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

   We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

   It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

Agency response to
Scott Hudson
(continued)

Zoological and/or botanical areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required.

7. The Forest Plan provides special management direction to protect riparian areas and their associated values. See Management area 7 of the Plan. The Plan provides for continued monitoring of resource use impacts on ecosystems.

0696

October 8, 1985

Michael A. Johns
307 E. Keogh Drive
Phoenix, Ariz. 85022

R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 W. Congress Street
Tucson, Ariz. 85701

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 9 - 1985
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Dear Mr. Tippeconnic:

1 This letter contains my comments on the Proposed Coronado National Forest Plan (Plan) and Draft Environmental Impact Statement (DEIS). Formulating comments has been hampered by the lack of detailed data in the DEIS concerning habitat quality for wildlife and livestock, species populations, species associated RVDs and similar information necessary to an understanding of the trade offs contemplated. A similar problem exists as to the lack of specificity in the site specific standards and guidelines. Standards such as "improvement" would be more understandable if accompanied by methodologies and deadlines. The final documents should be expanded to address this problem.

1. Computer Analysis.

2 The DEIS does not disclose the RVDs assigned to specific activities associated with each species of wildlife, or the species' population trends. Nor is the number of hours of hunting, birdwatching , etc. needed to make one RVD disclosed. Therefore it is not possible to understand or comment on the validity of the data used. The assigned values, on the other hand, are clearly too low. According to the publicly available

2 studies such as Loomis & Sorg (1982 and 1985), Forest Service, Idaho Fish and Game Department and U.S. Fish and Wildlife Service 1980 National Survey, the value of a wildlife associated RVD should be two or three times larger than the value used in the DEIS. Use of more appropraite values will more clearly define the trade offs and show that more emphasis on wildlife habitat and recreation is warranted. The basis for concluding that nongame wildlife use yields a higher net public benefit per RVD than consumptive use on the Coronado should be explained and documented.(DEIS p. 229).

3 The plan was formulated in part on the assumption that demand for hunting and fishing corresponds strictly to human population growth.(DEIS p. 227). The analysis should recognize the increase demand associated with increased success rates and be amended to provide more emphasis on wildlife populations.

2. Roads.

4 The Plan should contain an express provision that roads and travelways not be closed without prior public notice and an opportunity for comment. Roads open to permittees and Forest employees should generally be open to the public as well, unless closure is clearly necessary for resource protection.

5 The road density for new construction is grossly excessive at two miles per section (Plan p. 118). The plan should make it clear that such high road density is the exception rather than the rule. Optimum maximum density in good wildlife habitat should be ½ mile per section, with 1 mile per section a general maximum. Exceptions should be accompanied by a good environmental assesment, or an EIS where warranted.

5 The Plan should also contain standards for reduction of existing road densities along the above lines.

3. Wildlife Reintroductions.

I agree that wildlife should be reintroduced to all historical habitats (Plan p. 43). This should be done with coordination as called for, but the Forest must recognize its independent duty to manage for recreation and wildlife. Thus, the Plan should contain at least one unequivocal statement that this will be done, regardless of the progress which might be made by the cooperating agencies.

6 The Plan should include species specific goals so the public can comment and monitor. For example, it is not disclosed whether Elk is considered for reintroductions. Sightings statewide suggest Elk may be expanding their range. If suitable habitat exists for species not considered historical, introductions should be considered and discussed.

4. Forage Utilization.

7 The Plan's prescription for 45% utilization (P. 122) is generally too high. For example, the DEIS, p. 103 recognizes that 25-30% is all the stress the forage on fair range can take without sufficient rest. Similarly, the Plan, p. 66 employs a goal of 35-40% on well managed capacity range. This latter figure should be the maximum rather than 45%.

8 On a well managed National Forest open to hunting forage should not be the limiting factor on wildlife populations. The Plan should include a Forest Wide standard similar to the one in the Tonto Plan, in which sufficient forage is allocated to maximize populations of T&E, Indicator and Harvest Emphasis species.

9 The Plan has inconsistent standards regarding habitat improvement. For example, Prescription One, C03, says"improve" forage while , at page 119, it says to merely "maintain" it. The site specific standards should be carefully checked against the forest wide standards, and the emphasis should be upgraded from maintain to improve wherever possible.

5. Riparian Areas.

10 At page 123 the Plan calls for fencing riparian areas where prescribed by AMPs. The Plan should guide the AMPs rather than depend on them for resolution of this issue. The Plan should contain a standard to fence areas or place them under Management Level A when they consistently show resource damage or abuse. The standard should apply to all areas, not just unique riparian ecosystems (Plan pp. 70, 73). The standard should also not be dependent on a previous attempt at Level D Management (Id.).

11 The standards with regard to riparian areas are also inconsistent. For example, at page 59 of the Plan under C03 the standard is improvement, while at pages 119-124 the standard for the same habitat appears to be maintenance.

6. Alternatives.

12 Alternative E was apparently intended to provide the best mix of emphasis and balanced resolution of issues (DEIS p. 22). The reason for its rejection appears to be budgetary restraint. The budgetary consideration does not justify the vast opportunity cost of the Proposed Alternative, with its associated poor quality forest and crisis management result. In exchange for a relatively small increase in the budget over the Proposed Alternative, Alternative E would forfeit only $2.4 million in

potential benefits compared to $166.1 million lost in the Pro-
posed Alternative.(DEIS p. 51-52). Alternative E meets or
exceeds the Proposed Alternative in reaching RPA goals in
nearly all categories (DEIS pp. 126-127). The proposed Alter-
native will fail to meet demands for dispersed and wildlife
12 recreation by some 40% (DEIS pp. 44-45). The Alternative E
budget is less than the Max PNV Assigned budget and is clearly
warrented by the huge increase in benefits and environmental
quality, plus revenues to the State and additional jobs.

Subject to all the above comments, Alternative E should be adopted over the Proposed Alternative. It should be amended, however, to add the excluded acres for Pole Bridge RNA (DEIS pp. 116-117) and the two zoological/botanical areas provided in the Proposed Alternative (DEIS p. 118).

Sincerely,

Michael A. Johns

Agency response to
Michael A. Johns

1. The DEIS is intended to summarize the resource and use tradeoffs between alternatives. Relative impacts to wildlife habitat are shown in Table 52, DEIS. Populations have not been displayed because our management emphasis is on habitat management. The RVDs displayed for wildlife (Table 9, DEIS) provide a relative comparison of alternatives for wildlife use which is somewhat relative to populations as well as habitat quality.

   We disagree that there is a lack of specificity in standards and guidelines, especially as they apply to mitigating impacts on wildlife habitat (See Appendix C of Draft Plan). Also specific types of improvement projects are planned for some species (See Management Area wildlife objectives).

   The purpose of the Forest Plan is to provide overall management direction for the various resources and uses. In some cases the direction is general (goals and objectives) and in other cases it is very specific to a resource (wildlife) or to a specific site (South Fork of Cave Creek, MA 14). The specificity at this point in time is directly related to identified issues, concerns and opportunities. Project level decisions will be made case by case based on overall direction of the Forest Plan and a site specific environmental analysis.

2. General Comment:
   The benefit value assigned to wildlife recreation is too low.

   Specific References:
   P.1 - "The assigned values...are clearly too low."
   P.2 - "According to the publicly available studies...the value of a wildlife associated RVD should be two or three times larger than the value used in the DEIS."

   General Response:
   We do not agree with your statements concerning the wildlife recreation benefit values. Before responding to specific points, we would like to briefly explain the economic "value" concept applied and the actual computation used for the Coronado. Before proceeding, we must acknowledge that there is a great deal of disagreement among the public on the "value" of nonmarketed goods and services. Many of the public comments we have received thus far reflect these differences of opinion and your comments are representative of many from throughout Arizona. The great bulk of the comments such as yours regarding the "too low" or "too high" benefit values results from a misunderstanding concerning the economic theory which underlies the meaning and estimation of "assigned values" in forest planning. Your references to the Loomis and Sorg studies (1982 and 1985) indicate that you are familiar with the "consumer surplus" theory which forms the basis for these value estimates.

   Basic Definition of Economic Value:
   Economic value for recreation used in Forest Planning is measured by the net amount, in excess of their actual expenditures, that consumers are willing to pay for a resource. In conventional economic theory, this value is called "consumer surplus." Net willingness to pay, or consumer surplus, is the standard measure of value in benefit/cost analysis performed by the U.S. Forest Service, the U.S. Army Corps of Engineers, the Bureau of Reclamation, the Soil Conservation Service, the Bureau of Land Management, many State government agencies, and others.

   The most commonly used technique for estimating users' net willingness to pay for recreation is the "Travel Cost Method." A brief description of this technique will be used to illustrate the concept of consumer surplus. The "Travel Cost Method" relies on variations in travel costs of recreationists to trace out a demand curve for a particular type of recreation experience. The demand curve is usually downward sloping and to the right of the origin, depicting an inverse

Agency response to
Michael A. Johns
(continued)

relationship between quantity demanded and price. The total area under the demand curve may be thought of as the total, or maximum, willingness to pay ("total benefit"). In order to arrive at a net benefit value, the consumer's travel costs must be deducted from this total benefit measure. The area under the demand curve, but above actual travel costs, is a measure of net willingness to pay, or consumer surplus. As can be seen, consumers' actual expenditures do play a role in this estimation process; however, they are a part of the "cost" side of the equation, not the net "benefit" total.

Based upon this kind of valuation concept, the use of actual expenditures by hunters and fishermen is not appropriate as benefit values for valuation of wildlife. Expenditures are useful only for measuring the effect of impact on local economies of some resource management action. The reason for not attributing the indirect spending impact as part of the value of recreation is that the recreationist would have spent his money doing something else (or simply saved it), with an equal indirect impact somewhere else. The impact of the recreationist's expenditure on the local community is thus a transfer of spending from one place to another rather than a net addition of value. Use of gross expenditures as a measure of value would actually lead to maximizing inefficiency instead of efficiency. That is, if gross expenditures were used as a measure of value, new recreation sites would be located as far away from population centers as possible, so that people would have to incur large expenditures to get there.

The following brief list of references provide additional detail on this concept of "economic value."

Brown, Thomas C. 1982. Monetary Valuation of Timber, Forage and Water Yields from Public Forest Lands. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-95.

__________. 1984. The Concept of Value in Resource Allocation. Land Economics 60(3): 231-246.

Donnelly, Dennis M., John B. Loomis, Cindy F. Sorg, and Louis J. Nelson. 1985. Net Economic Value of Recreational Steelhead Fishing in Idaho. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-9.

Hansen, Christopher S. 1977. A report on the Value of Wildlife. U.S. Department of Agriculture, Forest Service, Intermountain Region, Ogden, Utah.

Martin, William E., Russell L. Gum, and Arthur H. Smith. 1974. The Demand For and Value of Hunting, Fishing, and General Rural Outdoor Recreation in Arizona. Technical Bulletin 211. The Agricultural Experiment Station, University of Arizona, Tucson.

Rosenthal, Donald H., John B. Loomis, and George L. Peterson. 1984. The Travel Cost Model: Concepts and Applications. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-107.

Ward, Frank A. 1982. The Demand For and Value of Recreational Use of Water in Southeastern New Mexico. Research Report 465. The Agricultural Experiment Station, New Mexico State University, Las Cruces.

In summary, we would like to point out that the belief that expenditures are equivalent to benefit values used in economic efficiency analysis is not supported by conventional economic theory. The "assigned" values used in Forest planning are not based on total dollars spent for travel expenses, food, lodging, equipment, etc. The economic value of an RVD is based upon the consumer's willingness to pay for the RVD, over and above his round trip costs

Agency response to
Michael A. Johns
(continued)

of experiencing the RVD. (An RVD is twelve hours of a particular wildlife recreation activity by one person).

Calculation of Benefit Value for Coronado:
The $16.90 value for hunting and fishing used for the Coronado is the result of a calculated weighted average using established RPA benefit values for big game use, small game use, and resident fishing use. The nongame wildlife use value of $22.76 is taken directly from the RPA estimates. The benefit values used are those in use for the 1985 RPA Program as of October, 1983. The use of these benefit values is mandated by National Forest Service policy. The weights used are taken from the 1980 Arizona Game and Fish Department data. The base data and calculations are shown below (the one cent difference in totals is apparently due to rounding differences).

	1985 RPA Benefit Value (Jan. 1, 1982 $)	Benefit Value (4th 1980 $)	Percent of Use	Weighted Values
Big Game	30	27.31	19.2	5.24
Small Game	18	16.39	46.1	7.56
Fishing	13	11.85	34.7	4.11
			Weighted Benefit Value	16.91

The nongame wildlife use uses the RPA benefit value of $22.76 ($25 in January 1, 1982 dollars). The overall result of using these benefit values can be calculated using the total wildlife outputs (Table 9, p.44, DEIS) and the total wildlife benefits (Table 11, p.47, DEIS). For the Proposed Action alternative, the average wildlife benefit value is $18.52 in 1980, 4th Quarter Dollars. Other alternatives are only slightly different.

Specific Responses:
In your comments, you state that available studies show that the wildlife benefit values should be two to three times larger than the value used in the DEIS. The studies that you cite do not support this conclusion. For example, the U.S.F.W.S. study you cite shows a lower value for big game hunting than that used for the 1985 RPA Program (see Sorg and Loomis, Empirical Estimates of Amenity Forest Values: A Cooperative Review, General Technical Report RM-107, Rocky Mountain Forest and Range Experiment Station, March, 1984). Your claim that correct values are two to three times that used is unsubstantiated. While it is true that an "expenditures approach" would yield much higher values for wildlife recreation, it has been shown conclusively by Loomis and Sorg (which you cited) and many others that this approach is theoretically and methodologically incorrect for uses such as forest planning.

Summary Conclusions:
In summary, our review of the procedures and actual values used to estimate the wildlife recreation benefit values for the Coronado National Forest does not indicate a need to revise these values. While it is true that the benefit values used for the Coronado are based on the established 1985 RPA Program benefit values, no convincing evidence has been offered which would indicate that these values are unreasonable or inappropriate. The procedures and values used by the Coronado National Forest are consistent with the direction used throughout the National Forest System.

3. General Comment:
The assumption that the demand for hunting and fishing will increase based upon human population increases results in a conservative estimate of demand. Because of this, more emphasis should be placed on increasing wildlife populations to provide the needed supply.

Agency response to
Michael A. Johns
(continued)

General Response:

We agree that the projected needs are conservative; however, the ability of the Forest to provide additional wildlife is limited. The assumption for estimating the potential future demand for wildlife recreation is shown in Appendix B of the DEIS, p.227. The projected growth rate of about two percent per year results in about a 22 percent increase over ten years. A comparison of the projected needs based upon this assumption and the State goals is shown in Table 30, p.76 of the DEIS. Based upon the population trend, the projected demand for wildlife recreation would be about 850 MRVDs by Period 5. The ability of the Forest to provide for this projected need is shown in Table 9, p.44, of the DEIS. The Maximum Wildlife Benchmark represents the Forest's estimate of the maximum wildlife increases which can be achieved in the Forest. Based upon our analysis, the Forest cannot meet the long-term expected demand for wildlife recreation in any alternative or benchmark.

The Proposed Action provides about 90 percent of the Maximum Wildlife Benchmark output in the Fifth Period. Since the Maximum Wildlife Benchmarks are so great, we believe the Proposed Action represents a reasonable compromise between outputs and costs.

4. The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. Approximately 70 percent of the Forest now provides the opportunity for some form of motorized recreation activity. (See Table 21, page 62, DEIS). Before any specific roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements. This requirement applies to any changes in management of the National Forest. Therefore, we see no need to include an "express provision" for closing roads or trails.

   In general, roads open to permittees and Forest employees are also open to the public. Protection of Forest Administrative sites, rest periods for campgrounds, and closures for safety, are some exceptions. Access to many parts of the Forest is legally controlled by private landowners who are also permittees. The Forest Service is working to acquire right of way ownership in these areas. In the meantime, many of the private landowners allow Forest Service personnel access, but will not allow the public through.

5. The road density guideline on page 118 of the Draft Plan is in error. The intent was to have an optimum average density for wildlife habitat of one mile per square mile. Also this density guideline was intended to include both existing and any new roads that might be planned. These things have been corrected in the Final Plan. Please note that the specific wildlife standards and guidelines, previously in Appendix C, have been moved to the Forest-wide prescription and the specific wildlife objectives are now found in the appropriate management area prescriptions. This change was made to eliminate repetitive material and make the prescriptions more understandable.

   The density of one mile per square mile came from studies conducted for deer and elk habitat. It should be noted that this is a guideline for mitigating impacts on wildlife habitat. As such, it represents an average. Depending on total resource needs, including wildlife needs, specific areas of the Forest may have a lower density and some a higher density. The average current density for the Coronado Forest is approximately one mile per square mile.

Agency response to
Michael A. Johns
(continued)

The Forest Plan projects very little need for additional roads. Approximately ten miles are estimated during the 10-year Plan period for fuelwood harvest. Some minor amounts of construction may also be necessary for mineral development activity. A site specific environmental analysis is always conducted prior to any construction.

6. We are unable to make unequivocal statements about reintroduction of wildlife species, because that responsibility rests with the State Game and Fish Departments, or sometimes the U.S. Fish and Wildlife Service. When suitable habitats on National Forest land are available, we will work closely to encourage the involved agencies to provide the animals. The only species currently under consideration for stocking are desert bighorn sheep.

7. The livestock forage utilization guideline of 45 percent shown on page 122 of the Draft Plan is a maximum level that has proven to be adequate for Mearns' quail habitat on rangelands in fair or better condition which are also receiving adequate rest. Page 103 of the DEIS also recognizes that use levels of 35 to 50 percent can be sustained where adequate rest is given. The use guideline given on page 66 of the Draft Plan has been deleted because it was in conflict with the definitions given for the range management levels on page 127.

   In summary, we feel the maximum 45 percent use guideline is adequate for protecting Mearns' quail habitat on well-managed rangeland. It is consistent with other use guidelines in the DEIS and Plan. Since this is a guideline, it would obviously have to be reduced when rangelands are not as well-managed such as those under level B or C management.

8. Allocation of forage under the Forest Plan is not a limiting factor on wildlife populations. Allowable use levels shown in the Plan reflect considerations for both livestock and wildlife. These conservative levels will provide more than adequate forage and other habitat requirements for all wildlife.

9. Thank you for pointing out the inconsistent wording for wildlife habitat objectives as appeared in Appendix C (page 119) versus those objectives in the management area prescriptions. This is one reason for deleting Appendix C and including the same material directly in the appropriate prescriptions. We agree the emphasis should be on improving habitat and have made changes where it was technically and financially feasible to do so.

10. The Forest Plan does guide the development of individual allotment management plans. Goals and objectives for management of riparian areas are given in the Forest-wide prescription and the prescription for Management Area 7 which is specific to riparian areas. The standard for range management states that the choice is between well-managed grazing (level D) or no grazing (level A). Addition guidelines have been added to Management Area 7 to help determine when an area should be excluded from grazing or not.

    Fencing is just one tool that is used to manage livestock in riparian areas. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing.

    Objectives and guidelines for managing rangelands as well as other resources are given in the prescriptions for each management area. The ultimate level of range management (level A through D) for a particular area will be determined by following these objectives and guidelines. Therefore, we see no need to make a blanket statement for the entire Forest.

Agency response to
Michael A. Johns
(continued)

11. Any inconsistencies were taken care of by moving the material in Appendix C to the appropriate management area prescriptions. It should be noted that while the Plan calls for improving all riparian areas that are in less than satisfactory condition, the standards referred to are for wildlife habitat maintenance or improvement.

12. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

    Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

    When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

    The primary difference between potentially lost benefits for Alternative E and the Proposed Action (PA) is in the loss of recreation benefits. This is the result of constructing substantially more recreation sites under Alternative E than under the PA. While we agree it would be nice to provide more developed recreation opportunities, it may not be financially feasible to do so.

    We can not agree the Proposed Action results in a poor quality forest or crisis management. As stated previously, the first priority is given to properly managing the multiple resources to keep future management options open. Only then are additional resource opportunities expanded.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 16 1985
RECEIVED

7731 E. 39th St
Tucson, Arizona 85730
Sept 12, 1985

Supervisor, Coronado National Forest:

– Thanks for keeping Mt Lemmon region as good as it is. Reference pending mgmt plan, draft EIS, etc:

1 – $12 million won't even make a start on rebuilding the Mt L highway! Far better to improve it a bit where needed & cost-effective; maintain it, police it more actively with strong penalties for reckless or DUI drivers – all at a fraction of the cost & much less environmental degradation. A 55 mile/hr speedway will cost a fortune – won't be any safer – and will bring more people, less concern, & more damage.

– Consider buses, trams etc for the public.

2 – Let fires burn where reasonably safe & appropriate.

3 – Eliminate overgrazing as rapidly as fair & practical.

4 – Please – no vehicles off-road – areas thus damaged in the Southwest never recover – I know & you should know!

– Rose Canyon Lake – off Mt L Highway – needs better trash facilities + pickup – almost none now – it will soon look like a garbage dump – often does now – what a shame! Take some of that $12 million road budget + put it into keeping our priceless mts + deserts clean + a few $$ into firm handling of traffic, trash, etc offenders.

– Thanks again for doing as good a job as you have – no doubt underfunded & under-manned & swamped!

– Good Luck,

Art Keyes

Agency response to Art Keyes

1. The proposed reconstruction of the General Hitchcock (Mt. Lemmon) Highway is for safety and maintenance needs. The road will be maintained as a scenic highway. It will be reconstructed within the existing alignment and to the existing standard of two lanes with a 30 mph design speed. A separate environmental analysis addressing site specific concerns for the road has been conducted. The analysis indicated use on Mt. Lemmon will not increase significantly due to the planned improvements. Use will increase as the result of population growth in Pima County and the surrounding area. The road is not the means by which to regulate or manage the users of the mountain. The highway is the means to transport all of the people safely to their destinations on the mountain.

   The Forest Service has considered other transportation alternatives for the mountain, and will continue to evaluate these. Neither the Coronado National Forest nor Pima County has the funding necessary to subsidize public transportation on Mt. Lemmon. Any alternative would have to be self supporting. Mt. Lemmon is very different from Sabino Canyon because there are private dwellings on Mt. Lemmon and because the road is a public highway. We do not have the options of closing this road or charging for use as we did in Sabino Canyon. No matter what transportation alternatives become available, the Mt. Lemmon Highway will be needed.

2. Although we can not "let fires burn" the Forest Plan will allow us the option of confining wildfires to specified areas where they are safe and can be used to meet appropriate resource objectives.

3. We agree with you that it will be necessary to temporarily reduce grazing while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the First Period and 338,000 in the Second Period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about 10 percent less than present. Any future increases in livestock numbers will be based on increased capacity.

4. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

5. We share your concerns about operation and maintenance of recreational facilities such as Rose Canyon Lake and Campground. We will increase our efforts in such areas as cleanup, law enforcement, and education of the public. Thank you for your support.

0614

Douglas Koppinger
6737 East Opatas
Tucson, Arizona 85715

CORONADO N. F.
OCT 10 '85

7 October 1985

R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic:

After looking over the Coronado National Forest Draft Environmental Impact Statement and Proposed Plan, I believe you and your staff have done a very good job at planning for the most important present and future uses of the Coronado, namely, recreation and wildlife.

Clearly, the use of the Coronado National Forest dictates that we recognize and plan for even greater emphasis on these uses, and that we downplay the relatively low level and value of traditional commodity production in this forest. When there are conflicts between these activities, the public benefit associated with recreational and wildlife values has to be weighed fairly against projected economic gains. The heavy recreational use and the exceptional animal and plant diversity of the Coronado compared to virtually every other forest are justification for the highest priority being placed on these uses.

I strongly support the following proposals:

1 A. Establishment of the nine new research natural areas proposed under Alternative D (if necessary Santa Catalina RNA should be reduced to 890 acres to free up acreage for new RNAs). Areas need to be set aside before they are changed to the point where their research value is lost. These areas amounts to a very small portion of the entire forest. The long-term benefits of preserving these areas for research clearly outweighs the value associated with other uses.

2 B. Protection of offically listed plants and animals and others that are rare or sensitive. Once again, the long-term benefits (research, aesthetics) are justification for this protection.

3 C. Protection of riparian areas. The limited nature of these areas, the crucial habitat they provide for a multitude of plant and animal species and the critical water associated with them are unquestionably justification for protective measures. In most cases this will amount to exclusion of livestock, mining and vehicles. It may also dictate controls on recreational use. There are some additional areas that need to be mapped as riparian management areas to provide needed protection; Reiley Canyon in the Winchester Mountains and Rattlesnake Canyon in the Galiuro Mountains

Letter to Tippeconnic
Page Two
7 October 1985

4 D. Strict control of recreational vehicle use. Clearly, ORV use seriously detracts from other uses of the public lands. Dirt bikes, ATVs and other vehicles should be restricted to existing roads to protect wildlife, scenic values and the recreational experiences of others. In some cases, specific roads will need to be closed to protect wildlife.

5 E. Restrict activities that destroy visual resources. Any road building, mining, wood cutting or other activities that destroy important visual features must not be permitted. The long-term public interest of maintaining the scenic integrity of a national forest should take precedence over short-term economic gains often associated with visual resource impairing activities.

6 F. Control of development in the Pinaleno Mountains. Any decision on astrophysical site development should wait until the EIS for this specific area is out and subject to public review. Wildlife values of this area must be considered as well as the need for public use and access.

7 G. Wilderness designation for the Mt. Graham Wilderness Study Area. The area has outstanding wilderness qualities. Forest Service areas with these qualities are rapidly diminishing. An offical designation is needed to protect Mt. Graham area to insure that it retains those qualities.

In conclusion, I feel that the long-term public interest associated with wildlife values and recreational use of the Coronado National Forest must be paramount in any decision-making process. These are overwhelmingly the most important present uses. It is inevitable that these uses will become even more predominant as Arizona continues to grow and pressures on wildife and recreational resources take there toll elsewhere.

Sincerely yours,

Douglas Koppinger

Douglas Koppinger

Agency response to Douglas Koppinger

1. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

   Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

   We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

   It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

2. Protection of the unique flora and fauna of Southeastern Arizona, whether listed or not, has long been a priority of management on the Coronado. Your support of this effort is greatly appreciated.

3. We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing.

   Very little, if any mining occurs in riparian areas due to the geology of such areas. New roads will be located outside of this sensitive zone. We recognize that many important riparian areas were not shown on the draft map. The final Forest Plan will include an expanded map.

4. The purpose of the Forest Plan policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. We have not identified any roads at this time that need to be closed for wildlife protection, *but the Plan leaves us leeway to do this if necessary. Before any specific* roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected uses to determine existing and future use requirements.

Agency response to
Douglas Koppinger
(continued)

5. Legitimate resource uses and activities are subjected to an analysis of their visual impacts. Appropriate mitigation measures are employed to protect the scenic integrity of the National Forest.

6. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

7. The Forest Plan now recommends wilderness designation for the entire 62,000 acre Mt. Graham Wilderness Study Area. Our current analysis now indicates there are no conflicts with this wilderness allocation and future management for the proposed Mt. Graham Astrophysical Area, whether it be development or no development.

0008 7-11-85

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

JUL 15 1985

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Dear Sir

In regard to the "Draft Environmental Impact Statement" I favor alternative D.

1 I am also in favor of an astrophysical observatory on Mt. Graham.

I'm a hiker but I have a great interest in astronomy.

2 also I ~~[illegible]~~ think ORVs should be banned except from existing roads, and I used to own a 4 wh. dr. and I never took it off a legal road.

Sincerely
Tex Liddle

P.S. I would like the Mt. Graham EIS

TEX LIDDLE
615 W. ALTURAS 116
TUCSON, ARIZ.
85705

Agency response to
Tex Liddle

1. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case with the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

2. The Forest Plan would continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORV's or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

0003 June 10, 1985

Dear Sir,

As a concerned citizen, I'd just like to convey my thoughts on the Coronado National Forest so that they might be considered in the planning process. I know that these opinions are not mine alone, but are shared by many of my fellow citizens.

I believe in the concept of multiple-use. To me this means maximum watershed protection, maximum wildlife habitat, recreation that is as non-damaging as possible, and limited, selective logging (if any).

I'd like to see a moratorium on the building of roads, as well as reductions (severe, if possible) in the areas in which O.R.V.s are permitted. I also believe that livestock grazing should be minimized.

In short, I'm speaking out for more emphasis to be placed on the wilderness value of the Coronado, as a place of sanctuary for animals, plants, and people who need to escape from the "rat-race" for a time. The Forest is not just an exploitable resource for the timber, ranching, and mining interests. It's for all of us.

Thank you very much for letting me have my in-put.

Sincerely.
Robert Cocke
1214 S. Wilson
Tempe, AZ.
85281

Agency response to Robert Locke

The basic transportation system for the Coronado National Forest is already in place, therefore, we project a minimal need for new roads. The Forest Plan will allow use of motor vehicles on existing roads and trails. Motor vehicle travel off roads or trails will not be allowed except by permit. A moderate level of well-managed livestock use, as provided by the Forest Plan, can be permitted with no detriment to the values you find so important on the Coronado.

9 Oct 1985

THE UNIVERSITY OF ARIZONA
TUCSON, ARIZONA 85721
COLLEGE OF ARTS AND SCIENCES
FACULTY OF SCIENCES
DEPARTMENT OF ECOLOGY & EVOLUTIONARY BIOLOGY

0612

CORONADO N. F.
OCT 10 '85

Mr. Robert Tippeconnic
Supervisor
Coronado National Forest
301 W. Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic:

This letter concerns the Proposed Coronado National Forest Plan, which you kindly mailed me. Following are some brief comments on the plan.

1 First, I suggest that the public input in planning would be far more interesting and substantial if the plan was intelligible to the lay person. Simply because managing a National Forest is a difficult job, it does not follow that the language used must be convuluted and rarely to the point.

More disturbing, however, is the lack of internal consistency. Here I refer to a number of statements regarding general policy, e.g., " the forest belongs to everyone" and "careful planning be done to retain the visual quality of these Forest lands." (pp 2 and 3 in the Summary). I was suitably impressed by the apparent dedication to saving the land for present and future generations, a sound policy in light of the tremendous growth of Arizona's population.

2 But then why does the Proposed Action Alternative include the construction of an astrophysical site on top of Mt. Graham? Laypeople and professionals alike recognize Mt. Graham as a unique and highly valued habitat. Its preservation as is should be of paramount importance; instead, I find notice of a proposed development akin to those already usurping Kitt Peak and Mt. Hopkins. Evidently, the intragovermental links are powerful, at least judging from the confidence of the Steward Observatory. They have already as much claimed the mountaintop as its own, as a visit to the Flandrau Planaterium will attest. Even Arizona Highways magazine proudly announces the construction of the "world's largest telescope" on Mt. Graham.

As a scientist, I can sympathize with the Steward Observatory's desire to aquire the highest ridge of the Grahams. But this does not obscure the fact that the proposed development conflicts with a broad spectrum of public interests. There is no way around this ugly fact: an astrophysical observatory of the proposed magnitude is the absolute antithesis of the natural splendor of Mt. Graham. Building on the peaks is, quite literally, chopping the head off of Mt. Graham.

A special use permit for the observatory cannot be considered a comprimise between conflicting interests. The permit would be a carte blanche to the Steward Observatory, and a slap in the face of all other National Forest users. Please reconsider and heed your own dictum: the forest belongs to everyone.

Sincerely,

James R. Malusa

Agency response to
James R. Malusa

1. We agree that the Forest Plan and Environmental Impact Statement are complex documents. We have made revisions throughout the documents to make them as simple as possible, considering the complexity of the material to be presented. We attempted to display the most significant information in the body of the documents for comparison of alternatives considered in detail. Additional detailed information was placed in appendices to ease the burden on reviewers not wanting to study the Plan in great depth.

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as it was for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0551

Audubon Society
4619 EAST ARCADIA LANE • PHOENIX, ARIZONA 85018

Oct. 3, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
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Editor

R.B. Tippeconnic, Forest Supervisor
Coronado NF
300 W. Congress
Tucson AZ 85701

Dear Mr. Tippeconnic:

Enclosed is the commentary of this chapter of the National Audubon Society regarding the Coronado Draft Management Plan and EIS. Thank you for this opportunity to respond. Please keep us appraised of your actions in this regard.

Sincerely,

William E. Luckett
William E. Luckett, Conservation Committee
MARICOPA AUDUBON SOCIETY

Scott R. Burge
Scott R. Burge, Chairman, Conservation Committee
MARICOPA AUDUBON SOCIETY

DEDICATED TO THE PROTECTION OF NATURAL WETLANDS IN AN ARID ENVIRONMENT

R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, AZ 85701

October 1, 1985

re: Coronado NF Draft Mgmt. Plan and EIS

Dear Mr. Tippeconnic,

The Coronado National Forest, a group of "Sky Islands" situated
geographically between the Mogollon escarpment of the Colorado Pla-
teau and the Sierra Madres of Mexico, supports a flora-fauna asso-
ciation of Nearctic and Neotropic elements. The ecological diversity
of these mountains, containing numerous species and community asso-
ciations unique within the United States, make the Coronado a bio-
geographical paradise. Accordingly, the significance of the Coronado
to naturalists, ecologists, birding enthusiasts and etc. cannot be
over emphasized. It is the the opinion of the Maricopa Audubon Soci-
1 ety that all management decisions should keep in perspective the
unique characteristics of the Coronado.

Recreation Resource

1 The Audubon Society has long been involved with recreational uses of federal lands, especially encouraging those uses which protect the ecological balance of the ecosystem. Accordingly, we believe that conservative management approaches to long-term economic utilization goals which not only conserve but act to enhance the environmental balance will provide for greatest amount of high quality recreation.

2 Off-road vehicles because of their destructive nature should be restricted not only to designated roads and trails but further restricted when recent climatic conditions has made them, if utilized, susceptable to extreme damage and they become impassible until repairs are made.

3 A majority of outdoor recreational opportunities are non consumptive or ecologically neutral. These uses such as birding, hiking, camping, scientific study, hunting, fishing and etc. should be promoted and will ultimately be more economically productive than the consumptive uses of mining, logging and grazing.

Wilderness Resource

4 The Maricopa Audubon Society can generally be characterized as believing that the more wilderness the better. In modern America it is virtually impossible to protect and maintain too much of the remaining roadless areas. Those areas which can be protected and left in an unspoiled state should be. Without destructive threats of mining activities, excessive logging, livestock grazing or construction projects associated with transportation or utility corridor development. Increased acreages of wilderness will benefit many other issues of concern.

Visual and Cultural Resources

5 The visual and cultural resources, whose values are difficult to measure, can best be managed by adoption of conservative forest operational policies which protect them. These policies should include

5 maximizing the acreage of designated wilderness where reasonable. They should promote better and more efficient use of present utility corridors. All resources could benefit from a moritorium on new programs of mineral exploration and extraction unless economic justification can be established, environmental damages clearly assessed and then satisfactorily mitigated. In a similar context, commercial silviculture operations have not been economically justified and should be permitted only to enhance other resource concerns. Grazing policies should be developed that reduce livestock impacts on steep slopes, desert grasslands and riparian vegetation.

Biological Resources

6 The ecological relationships of the Coronado are unique in a global sense. Numerous species of birds, plants, fishes, reptiles, mammals and insects occur as periphery species (at the margin of a biogeographical distribution pattern). On the Coronado these species coexist in symmpatric associations that are poorly understood at best and the impacts of consumptive resource utilization are not predictable. Even subtle environmental change can result in a habitat modification that might threaten a species through competitive exclusion. The cost of biological resource neglect could quickly outweigh benefits recieved from harvesting other available resources such as mineral ores, timber products and livestock forage where competitive markets abound.

Range and Watershed Resources

7 In the past livestock grazing has emphasized red meat production with little actual management to protect other resources. Overgrazing and range manipulations to remove woody species on the Coronado watershed has caused annual microchanges in these range environments that have accummulated for decades. The statement that 84% of suitable range habitat is in satisfactory condition or better is ludicrous.

On steeper slopes cattle trampling of frost heave has accelerated soil loss through sheet erosion. The resulting higher water drainage from these slopes increased flash flooding impacts and gully erosion in the down stream sandy alluvial riparian zones. This gully erosion was further aggravated by livestock grazing in riparian zones where unstable streambanks were washed away. This has contributed to lower water tables, acting to change the ecological structure of wash, stream and grassland environments. Examples of such habitats include the Sonoita Creek, San Pedro River and Santa Cruz River watersheds.

Many animal populations which depend on these habitats have diminished to the point where they are rare, while others have been extirpated. Even construction of stock tanks to provide livestock water away from riparian zones has provided habitat for introduced species such as the green sunfish. Unfortunately a source from which they find a way down stream into unique fishery systems as Arivaipa Creek.

8 The Maricopa Audubon Society strongly supports the exclusion of livestock from riparian ecosystems. In addition, livestock operations need modifications to conserve soils and increased water retention capacity of the watersheds. These modifications are likely to involve a reduction in livestock numbers and better animal husbandry practices to produce the desired range improvements needed to restore stability to the Coronado.

Timber and Forest Resources

9 While it is debatable whether or not silviculture operations are economically justified in the Coronado, many silviculture treatments can have beneficial impacts by increasing forest diversity. Problems arise, however, when treatments are applied uniformly in the forest and important components of a desirable ecosystem are eliminated.

Shelterwood silviculture systems are a good example. Along with harvesting timber, this system dramatically increases diversity of the Petran montane coniferous forest ecosystem. The 240 year rotation to provide for recruitment of old growth is acceptable and should be promoted across the state. Unfortunately, in its prescription it defines a final removal cut where remaining overstory trees are removed after several treatments. As timber is removed from a habitat the remaining older groves become increasingly important resources for wildlife populations. A final removal cut eliminates essential habitat components for many animal species and simply should not be done.

A second problem with the shelterwood system involves maintenance of older growth classes at a stocking rate of 120 basal area. Many species require areas of higher basal densities for one reason or another. The goshawk for example, selects dense stands ($\bar{x}$=168ba;120-220ba) of old growth groves (20-30"dbh) for nesting. Strategically placed islands of dense old growth needs development within the shelterwood system if forest habitats are to remain viable and allow for normal goshawk population fluctuation and mobility.

Woodland Resources

10 The Madrean evergreen woodland itself is a unique component of the Coronado. Accordingly, fuelwood harvest and prescibed fires should only be permitted within a structured system which protects the integrity of these habitats. Groves of old growth, particularly along drainages, should be encouraged not only to provide important community components for wildlife populations, but to help stabilize soils and reduce erosion. In addition, mechanical methods of vegetation removal such as chaining result in excessive soil disturbance and promote increased erosion and should be discouraged.

Mineral Resources

11 Mineral resource development causes environmental problems which are directly proportional to the degree of surface disturbance. Strip mines are undoubtably the most destructive. Silt laden acidified runoff from stripped areas pollute downstream waters for many miles, destroying riparian and aquatic habitats. Heavy metal contamination of water supplies can affect wildlife, livestock and human populations which seek to utilize the water resources, a relatively scarce commodity in the semi-arid southwest environment. Expensive reclamation methods are also cost prohibitive and take hundreds of years to succeed.

The processing of mineral ores has also become prohibitively expensive, primarily to prevent emissions being belched into the atmoshere where they become a prime component of acid rain. The complications arising from stripping and processing mineral ores compels that common sense be used and that it simply should not be done when alternate sources of the product are available. Technology

11 has not yet adequately addressed the economical and environmental problems of the mining industry.

Other types of mineral development such as exploration, drilling, shaft mining and etc. should only be administered when potential environmental impacts have been extensively mitigated. A successful mitigation must involve an actual plan that can properly maintain and restore multiple-use objectives at a reasonable cost. In most instances of the past, unfortunately this has not been the case.

Special Land Uses

12 The Maricopa Audubon Society has long supported the scientific community in it's research efforts to learn more about our world and the universe in which we live. In fact, discoveries of these research efforts has enlightened us to the importance of our environmental stewardship. We find ourselves however, opposed to the Mount Graham Observatory on the basis that the future of astrophysical research lies in space. The development and utilization of the space shuttle, future space stations and even lunar development will make earthbound observatories obsolete within a few decades and Mount Graham can best serve humanity as a wilderness refuge in the modern world.

13 Concerning the electronic site proposals, an existing electronic site is located within two miles of the proposed Castle Dome site at Melendrez Pass. Why is it not possible to further utilize the site at Melendrez Pass?

14 The Maricopa Audubon Society strongly supports land exchanges, particularly those which acquire additional fragile habitats outside the forest boundary.

Special Resource Areas

15 We solidly support the establishment of Research Natural Areas and Zoological-Botanical Areas proposed for the Coronado forest system. A unique biological resource such as the Coronado cannot be over protected.

Summary of Alternative Plans

16 The proposed action is a proposal of environmental tokenism designed to sedate the public into environmental complacency. The proposed action is characterized by inadequate or no action to attain many of the specified goals and continued environmental degradation of valuable biological resources can be expected. For example, neither the grazing nor the silviculture operations discussed will adequately address their ecological impacts.

17 It's hard to believe that heavily grazed hillsides can support more livestock utilization long-term (grazing level D) with less damage to watershed soils, that lower livestock numbers can sufficiently restore rangeland habitat to graze greater livestock numbers within the proposed time frame. The damage to the semi-desert hillside environments could take much longer to reclaim.

18 The shelterwood, selection and mini-clear cut proposals for silviculture operations have many beneficial possibilities in the realm of ecosystem management design. However, uniform application without sufficient concern for the entire spectrum of ecosystem components make them less desirable than wildfires which are not generally uniform unless the fire is catastrophic.

19

The proposed action in general is a consumptively oriented document with unreliable safeguards to encourage and promote sound future management.

Plan A, defined as no action is absurd. Obviously environmental deterioration would continue as it has for the past 100 years.

Plan B is a plan for environmental rape with virtually no concern for natural ecological communities which occur on the Coronado.

Plan C is an interesting let-it-be plan. Based on economic efficiency, it's propesals for large increases of wilderness and elimination of commercial silviculture operations are innovative ideas. Livestock grazing at level C is another of it's desirable aspects.

Plan D is similar to plan C in that it incorporates innovative ideas such as RNA's,ZBA's as well as silviculture treatment options. This plan also maximizes available wilderness resources and promotes livestock grazing at level C.

Plan E, primarily designed to address ICO's provides a wide open mixed proposal of management schemes. This plan would make the forest more accessible, therefore, more vulnerable to encroachment disturbance. Localized intensive utilization could well lead to localized management disasters.

Conclusion

20

After reviewing the various plans for public comment, the Maricopa Audubon Society believes that the direction of forest management is misdirected. This misdirection might not necessarily be inherent within the system, but lie with the ignorance and/or incompetency of forest management directives of the U.S. Department of Agriculture.

Decisions are promoted which have short term benefits but long term consequences based on consumptive utilization of available resources. A very limited amount of consumptive economic value can be achieved from the Coronado because of competitive markets elsewhere. It's greatest value, not only from an environmental perspective but ultimately it's greatest economic value, is based on it's ecological uniqueness in North America. These are the values that should be promoted and the social-economic transitory steps from consumptive to non-consumptive forest utilization begun. The Coronado should follow conservative management strategies of environmental protection and enhancement to increase these values during this process.

21

For the many reasons stated in this document, the Maricopa Audubon Society strongly supports plan D which is by far the most comprehensive in dealing with environmental failures of past management practices. A final ranking of management alternatives in order of preferability is as follows,

No. 1 Plan D
No. 2 Plan C
No. 3 Plan E
No. 4 Proposed Action
No. 5 Plan A
No. 6 Plan B

Agency response to
Maricopa Audubon
Society

1. We appreciate the interest and direct participation in management of the Coronado National Forest by members of the Audubon Society. Our efforts are enhanced by the active Arizona chapters.

   We believe our proposed Forest Plan is tailored to be responsive to the future needs of Southwest Arizona and recognizes the recreational and biological values of the Coronado.

   All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. The purpose of the planned policy for managing motor vehicles is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" off-road vehicles (ORVs) or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   This policy also allows for seasonal restrictions due to climatic conditions as use suggest.

3. The proposed Forest Plan does promote the nonconsumptive uses you suggest. It is our belief moderate levels of other uses such as wood harvest and livestock grazing can be accommodated also within the multiple use concept.

4. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Agency response to
Maricopa Audubon
Society
(continued)

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

5. Standards and guidelines for managing the visual and cultural resources of the Coronado National Forest are included in the prescriptions for all Management Areas. In addition, standards and guidelines for managing other resource uses such as utility corridors, mineral development, wood harvest, and livestock grazing were developed to mitigate the impacts of

Agency response to Maricopa Audubon Society (continued)

these activities on visual and cultural resources. Additional mitigation requirements are developed through site specific environmental analysis as individual projects are designed.

6. We agree the ecological relationships of the Coronado National Forest are unique and in some cases poorly understood. We can not agree that impacts of resource utilization are not predictable in many cases. For example, the Santa Rita Experimental Range is at the heart of the Coronado N.F. Numerous studies have gone on for over seventy years which provide invaluable data on relationships between livestock grazing and the desert environment.

   Information such as this was used in development of standards and guidelines for the proposed Forest Plan. Management strategies are on the conservative side to allow for unknown elements.

7. The statement that 84 percent of suitable rangeland is in satisfactory condition is a fact. It applies only to lands administered by the Coronado National Forest. The watershed examples you cite, Sonoita Creek, San Pedro River, and Santa Cruz River, are a mixture of private, local, State, and federal lands. Coronado National Forest lands make up a small but important part of these total watersheds. Forest lands generally occur in the upper portions of the watersheds as you suggest. Most of the steeper lands are unsuitable for grazing and have not been grazed extensively since the lands came under Forest administration. Many of the steep slopes naturally generate high runoff. The watershed impacts you note are mostly due to past and present downstream activities.

8. We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing. Criteria to help identify these extra sensitive areas have been added to the Forest Plan in range management standards and guidelines for Management Area 7.

9. Timber harvest under the Forest Plan would be done for the very values you have stated. Maintenance of healthy stands of trees is essential to maintaining those values now and in the future. The silvicultural methods proposed for harvest call for establishing and maintaining a diversity of age classes, including mature and overmature trees up to 240 years. A diversity of tree densities is also prescribed. Standards and guidelines are shown in the management prescription for Management Area 2 in the Forest Plan.

   Final removal cuts are necessary to complete regeneration of new stands. The old growth component needs are provided on a rotating basis as younger stands move into the mature and overmature stages. Additional old growth needs and additional stand densities are provided in adjacent areas that are unsuitable for timber harvest due to terrain or special designations such as wilderness. The acres (13,729) determined to be suitable for timber harvest on the Coronado National Forest represent only 12 percent of the total coniferous forest type.

10. Fuelwood harvest on the Coronado National Forest is an activity used primarily to meet other resource objectives such as providing recreational opportunities and wildlife habitat. The silvicultural standards for wood harvest and guidelines for prescribed fires will protect the integrity of all woodland ecosystems. An old growth component is provided by the revised plant and animal diversity standards and guidelines for fuelwood harvest as shown in the Forest-wide Management Prescription.

    Methods such as chaining are not used for fuelwod harvest. They may be used on a limited basis to control woody species invading natural grasslands. The wood may in turn be sold as fuelwood. Appropriate places to use these methods are shown in Appendix D of the Draft Plan.

Agency response to
Maricopa Audubon
Society
(continued)

11. Forest Service policy toward mineral activity on National Forest System lands is implicit in law. All minerals on the public domain, except those specifically subjected to other disposal by Congress, are subject to appropriation by the location of mining claims. The 1872 Mining Law was a grant by Congress of the right for individuals to go on the vacant, unappropriated public domain to search for, disclose, appropriate, produce, and process the minerals. It was a grant also of the right to use surface and surface resources necessary to those operations and of reasonable access to them. The grant is limited only in that unnecessary or unreasonable activities are not authorized.

    Sales of common materials are made under the authority of the Materials Act of 1947, as amended (Material Act). Leases are made under the authority of the Mineral Leasing Act of 1920, the Leasing Act for Acquired Lands of 1947, the President's Reorganization Plan No. 3 of 1946, the Geothermal Steam Act of 1970, and the Coal Leasing Amendments Act of 1975 (Leasing Laws), most of which have been amended one or more times.

    Three other laws have major relevance to the Forest Service function relative to minerals and the effects of mineral activity. The Mining and Mineral Policy Act of 1970 (MMPA) provides a National policy which must guide the Forest Service. The Federal Land Policy and Management Act of 1976 (FLPMA) provides for an information base for locations under the 1872 Act and defines the basis for removing Federal land from mineral activity. The Wilderness Act of 1964 limits the application of the Mining Law and the Leasing Laws, and in certain situations reduces the rights accorded to those operating under the Mining Law.

    Minerals are fundamental to the Nation's well-being. The National Forest System by coincidence of geology and geography is a principal storehouse of minerals and energy. The search for an removal of minerals and energy resources are authorized uses of the National Forest System, to be encouraged and facilitated in accordance with the National Mining and Mineral Policy Act of 1970 and conducted in the public interest.

    The Forest Service objective is to carry out the mineral management mission in a fair and timely manner, consistent with multiple-use management principles, to integrate the exploration, development, and removal of mineral and energy resources with the use and conservation of other resources. The Forest Service will, through appropriate regulations and plans of operation, seek to minimize adverse impacts to other resources while fulfilling our mandate to foster mineral development.

12. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

13. Although the Forest Plan and EIS identify potential electronic sites, including Castle Dome, additional site specific analysis will be required before they could be occupied. The current analysis only identifies them as being suitable for future electronic needs. The additional analysis would determine the extent and type of development that is compatible with other resource uses. The Castle Dome Site was identified by the Tucson Electric Power Company and others after a determination that the Melendrez Pass Site would not meet their future needs.

14. Thank you for your support of our land exchange policy. Unfortunately, our normal land exchange authorities do not extend to lands outside the National Forest System.

Agency response to
Maricopa Audubon
Society
(continued)

15. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

16. While we agree the Coronado National Forest is a "truly unique and a national treasure in terms of biological diversity and importance", we have to disagree with your assessment of National Forest management.

The National Forest System is mandated by Congress to develop and administer the renewable surface resources of the National Forests for multiple use and sustained yield of the several products and services obtained therefrom. This basic mission is, therefore, one of conservation and wise use of available resources and not one of simple preservation.

We also disagree the Proposed Action is oriented to consumptive utilization of available resources and will result in environmental degradation. All resource uses are within sustained yields based on all resource considerations. Proposed management strategies are conservative and will insure all future nonconsumptive and consumptive opportunities are available.

17. Level D range management is a management intensity and does not necessarily imply a given intensity of livestock grazing. It implies a better job of managing the livestock which in turn does allow for improvement of rangeland conditions. The other technique used to improve rangelands is the removal of livestock where the numbers exceed current capacity. We agree that desert and semi-desert environments will take longer to recover. These areas are the ones that will receive priority treatment and most likely where reductions in livestock numbers will be needed.

18. Please see response number 9. Unfortunately some wildfires are catastrophic as you have noted. The Forest does use fire under prescribed conditions to complement the other silvicultural techniques in both coniferous forest and woodland ecosystems.

19. Please see response number 1.

20. Please see response number 16.

21. Please see response number 1.

0715

7360 No. La Oesta Av.
Tucson, Az. 85704
Oct. 1, 1985

CORONADO N. F.
OCT 11 '85

Forest Supervisor, Coronado National Forest
300 West Congress
Tucson, Az. 85701

Sirs:

Thank you for the proposals on the forest. Like most lay persons, I just want the best possible preservation for the forest, even if it means keeping the public within certain bounds. That summarizes my overall feeling, but I do believe that it would be a good idea to include the

1 RESEARCH RANCH that you mention on page 26 in your protection,

because it is an area that I happen to have known for almost 30 years. So is the Coronado Forest, for that matter, but I always took the latter for granted.

Now, I leave it in detail to what I hope is your preservation bias.

Hopefully yours,

Luretta Bagby Martin

Mrs. Charles H. Martin

Agency response to
Mrs. Charles H.
Martin

The Research Ranch is included in Management Area 8 (See Plan) where the overall object is to "manage to provide opportunities for nondisruptive research and education."

The Research Ranch will continue to be managed under a memorandum of understanding with the Audubon Society. It was not recommended for research natural area designation, but is afforded as much protection as an RNA. Current research involves experiments that would not be allowed if official RNA status were granted. A portion of the Ranch that does qualify as an RNA is being recommended (Canelo RNA, 350 acres).

0672

TUCSON,
OCT 1 . 1985
RECEIVED

Phoenix
Az. 85028
10/12/85.

Dear Sir,

I am writing to you to give you my views on priorities for the Coronado National Forest Plan.

1 1. My number 1 priority is to reduce the emphasis placed on timber cutting and increase the emphasis on recreational use. Arizona has so little real forest, that it should be preserved and not used as a source of subsidized low-cost timber. The areas I am familiar with (Chiricahua and Mt. Lemmon) are really beautiful and I would favor a ban on new roads and timber cutting and an increase in funds for recreational use.

2 2. My second priority is to control access by motor vehicles. Most of the Coronado Forest areas are fairly small and motor vehicles should be restricted to existing roads. My experiences of good camping have sometimes been greatly diminished by noisy ATV's cutting through the forest. I would like to see vehicles restricted to existing roads.

3 3. I also would like to see a reduction in grazing in the Coronado. The negative aspects for me are: firstly the impact on the ecology and secondly the distraction and incongruence of finding cows in ~~such~~ an environment

3 that is so foreign to them. It is difficult to believe you're in a natural forest or wilderness with cows wandering around.

4 4. The proposed Mt. Lemmon road also concerns me. I am sure that the right answer here is to do a full environmental impact study and base the plan on what traffic (human) the Mt. Lemmon environment can sustain without damage. Personally, I would accept a bus shuttle system.

5 5. Fuelwood cutting is currently very uncontrolled. Frequently I have seen ~~st~~ healthy trees (especially junipers) cut down just for firewood.

I would strongly favor higher fees for fuelwood cutting. Incidentally, I have a wood fire and enjoy it — but I'd be prepared to pay more and still have a forest.

6 6. Finally, I'd support the 3 remaining wilderness areas proposed. Arizona's forests are fragile, Coronado's are small, and the best way of protecting them is through wilderness designation.

Yours faithfully

A J Matthews

Agency response to
A. J. Matthews

1. Timber harvest on the Coronado National Forest is done to achieve recreation and wildlife objectives. Maintenance of healthy stands through periodic harvest is necessary to sustain those values. Less than one percent of the Forest is suitable for timber harvest. The question of recreational fees is under current study by the Administration and Congress.

   As a matter of principle, we do not believe that it is appropriate to single out Forest Service timber operators as being the sole recipients of a federal "subsidy." Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid by that individual to enjoy those benefits. Another way of expressing this would be to view it as an income or wealth transfer. This kind of income redistribution does not necessarily involve the actual transfer of cash. For example, in the case of a recreation user who pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full actual cost of providing that benefit. Since the source of the Forest Service recreation management funds is the public treasury, it could be said that all recreation users on the National Forest are being subsidized. Viewed from this perspective, almost all of the use and enjoyment derived from the Coronado National Forest could be considered to be a subsidy. This kind of subsidy would include virtually all developed recreation users, dispersed recreation users, skiers, bird watchers, wilderness users, hunters and fishermen, all downstream water users who benefit from watershed management, private property owners who benefit from Forest Service fire protection programs, range permittees, firewood users, anyone who uses a Forest Service road, etc. The potential list of Forest users who could be considered to be the recipients of a subsidy or income transfer is practically endless. Under the existing rules of our society, the public sector provides many such subsidies which touch the lives of all citizens. The ultimate decision of who receives a subsidy and who pays, rests with the elected representatives of the people; in other words, it is a political decision. The U.S. Forest Service, as custodians of public trust lands, operates under authorities granted by the U.S. Congress and is not empowered to make the ultimate decision of who is subsidized and who pays. In summary, the subsidy issue which you raise is indeed a critical issue. However, it should be remembered that timber operators are but one among many National Forest users who receive benefits in excess of the costs necessary to produce and distribute those benefits.

2. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

3. The Forest Plan provides for balancing livestock use and capacity by the second decade through reductions in numbers and increased capacity. The number of livestock sustained by the fifth decade is predicted to be less than present.

4. The proposed reconstruction of the General Hitchcock (Mt. Lemmon) Highway is for safety and maintenance needs. The road will be maintained as a scenic highway.It will be reconstructed within the existing alignment and to the existing standard of two lanes with a 30 mph design speed. A separate environmental analysis addressing site specific concerns for the road has been conducted. The analysis indicated use on Mt. Lemmon will not increase significantly due to the planned improvements. Use will increase as the population expands. Use will increase as the result of population growth in Pima County and the surrounding area. The road is not the means by which to regulate or manage the users of the mountain.

Agency response to
A. J. Matthews
(continued)

The highway is the means to transport all of the people safely to their destinations on the mountain.

The Forest Service has considered other transportation alternatives for the mountain, and will continue to evaluate these. Neither the Coronado National Forest nor Pima County has the funding necessary to subsidize public transportation on Mt. Lemmon. Any alternative would have to be self supporting. Mt. Lemmon is very different from Sabino Canyon because there are private dwellings on Mt. Lemmon and because the road is a public highway. We do not have the options of closing this road or charging for use as we did in Sabino Canyon. No matter what transportation alternatives become available, the Mt. Lemmon Highway will be needed.

5. We disagree that fuelwood cutting is uncontrolled. All fuelwood harvest is done by permit only. There are three types of fuelwood harvest permitted. Some manzanita areas have been designated where permits are issued free to cut any manzanita whether it is green or dead. Some areas have been designated where permits are issued for a fee to gather dead and down wood. Some areas have been designated where permits are issued for a fee to harvest green standing wood which has been marked for cutting. The amount, type, and areas of harvest are tightly controlled.

   Fuelwood harvest on the Coronado is done to achieve other resource management objectives. For example, tree harvest may be necessary to meet a specific habitat need for wildlife. Fees for fuelwood are periodically reviewed and adjusted to be consistent with general area selling prices minus costs of harvesting.

6. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

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Agency response to
A. J. Matthews
(continued)

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October 7, 1985

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, AZ 85701

0694

Mr. R. B. Tippeconnic:

Reference your Summary of the Draft Environmental Impact Statement for the Coronado National Forest Proposed Plan, Reply to: 1920, June 26, 1985.

The following opinions are for your consideration and are submitted by the undersigned as the Adopt-A-Trail point of contact for the Huachuca Hiking Club and the Sierra Vista District Ranger Office of the Coronado National Forest. The Huachuca Hiking Club comments have been submitted by Mr. John Staples.

I endorse your PA (Proposed Action) Plan approach to management of the Coronado National Forest for the next 10-15 years for the following reasons:

a. The PA plan is more middle of the road approach and should satisfy more people. Continued budget constraints will limit the Forest Service in undertaking new approaches and expansion of services to the public.

b. I am against expanding private interest groups' use of our National Forest Lands (NFL). Experience has shown that ultimately deteriation of our NFL results because the Forest Service does not have the manpower resources to properly manage the programs.

c. I support Forest Service efforts in expanding the number of Research Natural Areas, Zoological-Botanical Areas, limited road maintenance and concentrated trail construction and maintenance in wilderness areas. The increase in public awareness and use of these areas demands more support now. Further delays in reconstructing existing damaged trails as a result of erosion and fallen trees just increases the cost in the long run.

1 d. Right-of-Way Acquisition is critical and every opportunity available to obtain additional Right-of-Ways should be taken. Public access has been reduced considerably in recent years due to private land owners securing roadway gates in many areas.

2 The Adopt-A-Trail Program must be pushed by the Forest Service. It has been my experience since 1983 that there are enough people interested in helping the Forest Service maintaining trails. Publicity and solid support for volunteers effort by the Forest Service would provide significant results. The Sierra Vista District Ranger Office has created an excellent display for recognizing volunteer efforts. Members of the Huachuca Hiking Club have donated over 1,200 hours to date in clearing trails, and I personally hope that within 3 to 5 years, all of the major trails in the Huachuca Mountain Range (includes Miller Peak Wilderness Area) will have been cleared for

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 9 - 1985
RECEIVED

2 hiking, backpacking and horseback riding. After that, minimal effort will be needed to maintain the trails.

For the past three summers, I have been a Volunteer Leader for the Volunteer Vacation Program sponsored by the American Hiking Society. The Society in 1985 organized volunteer crews for 19 sites in the USA (Alaska and Hawaii included) with 10-12 volunteers at each site for 10 days. The one site in Arizona is out of the Alpine Ranger District. My group cleared 16 miles in eight days in the Absorka-Beartooth Wilderness area, Gallatin NF, Livingston, Montana this summer. If you are interested to learn more about this program, I would be happy to meet with you.

3 I appreciate the opportunity to comment on your NFL plans. Please keep me on your mailing list.

Lester A. Mauk

Lester A. Mauk
2601 Meadowlark Dr
Sierra Vista, AZ 85635
(458-5260)

Agency response to Lester A. Mauk

1. The Forest Plan identifies legal public access as one of the most important issues or concerns facing the Coronado National Forest. Although progress has been made in past years, much work remains to be done. Future progress will only be as fast as cooperation with others and funding permits. Perhaps the trail volunteers could assist in this endeavor.

2. We deeply appreciate the work the Huachuca Hiking Club and other volunteers have done for the Forest. We plan to continue these volunteer programs and are interested in working with you and others to expand the programs to other parts of the Forest.

3. We will retain your name on our mailing list for future planning efforts.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
NOV 18 1985
RECEIVED

0792

2705 North 25th Place
Phoenix, Arizona 85008
14 November 1985

Mr. Robert Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Sir:

I am writing to support alternative D for the Coronado National
1 Forest. With a few exceptions, I believe that this alternative
offers the best chance to preserve the great natural attributes
of the Coronado Forest while still allowing for economic development in the area.

The ORV rules for the Santa Catalina District allowing ORV use
only on designated roads and trails should be adopted forestwide.
Foot trails should also be off limits to motorized travel. I
2 was packpacking in the Chiricahuas a few months ago near Rustler
Park and came across an area near the edge of the wilderness are
where ORV's had driven across a meadow, and ripped everything
up. I'm sure you'll agree that this kind of activity must be
stopped. I support designation of all of the Research Natural
Areas and Zoological-Botanical Areas, plus the addition of several
thousand acres around high peak on Mt. Graham as a ZBA to
3 preserve habitat for the Mt. Graham Spruce Squirrel. The
Coronado Forest is listed by the Nature Conservancy as the number
one National Forest in terms of sensitive plant and animal
species and biologic diversity.

Greater emphasis needs to be placed on trail building and maintenance and construction and improvement of developed sites.
4 All three WSA's, Mt. Graham, Bunk Robinson, and Whitmire Canyon
should be made wilderness plus the four BLM areas should be added
to the wilderness system also. Whitmire and Bunk Robinson, like
5 the Chiricahuas contain many rare and unusual species at the
northern extent of their range. The entire Mt. Graham WSA
should be made wilderness and any plans for an observatory
6 complex should be scrapped. Mt. Graham is too precious to destroy.

7 I applaud the Forest Service's decision to end overgrazing by
the second period, however careful study must be made and if

RANGE CAPACITY DOES NOT INCREASE AS PROJECTED, THEN USE LEVELS
SHOULD DECREASE. OVERGRAZING MUST BE ENDED IN THE FIRST TWO
7 PERIODS AND IMPROVEMENT IN RANGE AND WATERSHED CONDITIONS MUST
BE THE PRIMARY GOAL. CRITICAL RIPARIAN HABITAT SHOULD ALSO BE
PROTECTED FROM GRAZING. I OPPOSE ANY NEW ROAD CONSTRUCTION TO
ACCESS FUEL WOOD UNLESS THE ROAD IS CLOSED AND RESTORED TO ITS
8 NATURAL CONDITION AFTER THE AREA HAS BEEN CUT. HARVESTING SHOULD
BE LIMITED IN SENSITIVE WILDLIFE AREAS. PERMIT FEES SHOULD
BE RAISED TO AT LEAST COVER THE COST OF OFFERING THE SALE AND
THAT INCLUDES ROAD BUILDING.

I APPRECIATE THE OPPORTUNITY TO COMMENT ON THE PLAN AND WHILE I
9 REALIZE THAT THE DEADLINE FOR COMMENTS ON THE DRAFT PLAN HAS
PASSED, I WOULD HOPE MY COMMENTS WILL STILL BE STRONGLY CONSIDERED.

SINCERELY,

Matt McWenie

MATT MCWENIE

Agency response to
Matt McWenie

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   Travel on trails within the Santa Catalina Ranger District will continue to be restricted to nonmotorized means. Restrictions for other trails could be considered on a case by case basis as the need arises. The need for restrictions on a Forest-wide basis will be studied during this next planning period.

3. We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

   Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

   It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

Agency response to
Matt McWenie
(continued)

Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the plan, and others were considered as suggested by various respondents.

The question of designating a zoological/botanical area on Mt. Graham for the Mt. Graham spruce squirrel will be explored in the EIS being prepared for the astrophysical proposal.

4. The Forest Plan does place great emphasis on maintenance of existing trails and recreation sites. This will be done by prioritizing available funds and using volunteers. Although it also identifies additional trail and recreation site needs, the construction of these will be dependent on available funding from Congress. We plan to work with other agencies and private enterprises to provide needed recreational facilities.

5. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

Agency response to
Matt McWenie
(continued)

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

6. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

7. The Forest Plan and all alternatives would end overgrazing within the first two decades after implementation. Maintenance and improvement of watershed and rangeland conditions are primary goals. Estimates have been made of the results of applying the management prescriptions and displayed in the Plan. It is important to keep in mind that these are estimates and not targets. Improvements in range capacity through better management will be used along with any necessary reductions in numbers to achieve the end to overgrazing.

   We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing.

8. Fuelwood harvest on the Coronado National Forest is an activity used to meet other resource objectives such as providing recreational opportunities and providing wildlife habitat. Some access roads are necessary to manage the stands to meet these resource objectives. Only ten miles of roads are planned during the Plan period.

   Permit fees are continuously evaluated and adjusted as necessary to be consistent with current costs and product values.

9. Thank you for your comments. They have received the same consideration as any others.

Oct 9, 1985

0705 **Audrey Miller**

TO. District Ranger
Coronado Nat. Forest
Douglas, Arizona

Under our management the last 10 or 12 years. it is my belief that the permit in Cave Creek has improved- With this in mind I believe the use should stay as is at this time -

Audrey M. Miller, Manager
Three Triangle Ranch Corp.
P.O. Bx 167
Portal, Arizona
85632

DOUGLAS RANGER DISTRICT
Received 10/9/85

	Action	Info.	Initials
DR			
EMA			
PAY CLK			
RES CLK			
RANGE			
R&L			
REC FOR			
EC TECH			
FMO			
AFMO			
RGE CON			
WL BIO			
PORTAL			
RUCKER			

Agency response to Audrey M. Miller	We agree that your current grazing permit, as it is now implemented, is adequate to meet all management objectives for Cave Creek. The Forest Plan proposes no changes in the current management or use of livestock in that area. Any future changes would have to result from allotment analysis conducted on a regular basis or in response to some rapidly changing need.

RE-SUBMITTED October 10, 1985 under the PA Program of 1985

0667

~~February 22, 1983~~

Forest Supervisor
Coronado Nat'l Forest
Federal Bldg.--301 W. Congress
Tucson, Arizona 85701

Statement Relative to Proposed Coronado National Forest Plan.

RE: Overall comment on Proposed Plan

1 Emphasis of the Plan indicates the Coronado to be mainly a grazing and fuelwood Forest. Whereas these uses might better be incidental to a concept of the Coronadde as a protection Forest - protective of the soil, the acquifer, scenic values, plant and tree community, wildlife community; - letting compatible uses of recreation, grazing, and fuelwood cutting occur where they may.

Isn't the Forest just being there an optimum use? Does every acre have to be put to some viable use? This last seems to be the criterion of most land planning.

A case in point; - while driving over a winte r road some years ago on the Superior National Forest in Minnesota (a winter road is one night's freezing at 30° below of compacted snow) and crossing a 100 acre non-productive swamp (sic,non-productive of what) one of the boys from the Supervisors Office remarked "I wonder how this could be made productive" (sic, productive of what - energy, food, a place to live).

Perhaps having been there tens of thousands of years is an optimum use. So perhaps a large part of the Coronado!

Submitted by

Ted R. Muller

~~ex-Sierra Vista District~~

Rt 1 - Box 117
Hereford - AZ
85615

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 1 6 1985

RECEIVED

REaSUBMITTED October 10, 1985 under the PA Program of 1985

~~February 22, 1983~~

Forest Supervisor
Coronado Nat'l Forest
Federal Bldg. - 301 W. Congress
Tucson, Arizona 85701

Statement Relative to Proposed Coronado National Forest Plan.

RE: Designation of Prescription #4 as the management designation for the East slope of the Huachuca Mountains - south from Brown Canyon.

It is strongly and urgently recommended that the Prescription #4 be changed tp Prescription #1 as the higher and better use of this area.
(and the #3 and #7 of 1985below the #9 of Miller Peak Wilderness)
By the very definition of Prescription #1 "steep rugged lands that are visible from major travel routes" this prescription certainly fits this area rather
2 than Prescription #4.

In addition the area is directly visible to some 10,000 population, with a probable doubling in the first ten-year period. Grazing of this area will gradually phase out as will fuelwood demand when the present "fad" fades before the actual realized cost of fuelwood and the convenience of pushing a button.

Submitted by Ted R. Miller
Rte. 1 - Box 117
Hereford, Arizona
85615

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

RESUBMITTED October 10, 1985 under the PA Program of 1985

February 22, 1983

Forest Supervisor
Coronado Nat'l Forest
Federal Bldg. -301 W. Congress
Tucson, Arizona 85701

Statement Relative to Proposed Schedule for Recreation Site Construction
P. 21, Proposed Coronado National Forest Plan.
(now P. 27)

RE: Reef Campgrounds (top of Carr), Carr Canyon Picnic Areas (Healy land), Broken Arrow Picnic Area. (Miller Canyon)

Strongly recommend a minimum of development now under way for the Reef Campgrounds in favor of and development of the Carr Canyon Picnic Areas and the Broken Arrow Picnic Area.

3 This would eliminate the extremely [redacted]/benefit ratio proposed blacktop road to the top of Carr diverting the funds to Carr Canyon and Broken Arrow areas which show a [redacted] cost/benefit ratio and are long-needed and useful developments. Maintain the upper Carr Canyon road as a good gravel road instead of re-routing and blacktopping - unwarranted high cost construction.

Submitted By
T.R.M. Ted R. Miller

~~CC-Sierra Vista District~~

Rte. 1 - Box 117
Hereford, Arizona
85615

RE-SUBMITTED October 10, 1985 under the PA Program of 1985

~~February 22, 1983~~

Forest Supervisor
Coronado Nat'l Forest
Federal Bldg. - 301 W. Congress
Tucson, Arizona 85701

Statement Relative to Proposed Coronado National Forest Plan.

RE: Carr Canyon Road #368 proposed paving.

4 The spending of $920,000 for the paving of this dead-end road would certainly appear to be unjustified considering the very costly construction and the limitedprojected use of this road.

The cost-benefit factor of this road must surely be way out of practical consideration. In this needful period of governmental belt-tightening the road should certainly be placed on the highest shelf as an unwarranted spending of public money.

Submitted by Ted R. Miller
Rte. 1 - Box 117
Hereford, Arizona
85615

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

RE-SUBMITTED - October 10, 1985 under the PA Program of 1985

~~February 22, 1985~~

Forest Supervisor
Coronado Nat'l Forest
Federal Bldg. - 301 W. Congress
Tucson, Arizona 85702

Statement relative to Proposed Coronado National Forest Plan.

RE: Wording on Page 23 18 1985 Draft of Coronado National Forest Draft Environmental Impact Summary viz. "Timber and Forest Products" -(Fuelwood and other forest products will be made available to residents of Mexico when and where U. S. citizens are not fully utilizing available material), and

On Page 81 of Draft Environmental Impact Statement, proposed Coronado National Forest Plan viz. "Other Forest Products - Including residents of Mexico, when the products are not fully utilized by U. S. citizens".

5 WHY!! - should we plan to give Mexico our resources when Mexico has exhausted their own? Let the Coronado stay out of this international picture.

Submitted by T.R.M.
Rte. 1 - Box 117
Hereford, Arizona
85615

Ted R. Miller

Rte. 1 - Box 117
Hereford, Arizona
85615

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

Agency response to
Ted R. Miller

1. The National Forest System is mandated by Congress to develop and administer the renewable surface resources for multiple use and sustained yield of the several products and services obtained therefrom. This includes protection of the soil, water, scenic values, flora, and fauna. Unless these basic resources are protected, current and future opportunities for recreation, livestock grazing, and fuelwood harvest will not be available.

   All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. The prescription for Management Area 1 is intended for lands that are generally too steep to support most resource uses, including livestock grazing and fuelwood harvest. Although Management Area 1 includes lands that are highly visible, it was not intended to cover all of the lands of the Forest considered as scenic. All management prescriptions, such as the ones for Management Areas 3, 4, 7, and 9 provide for management and protection of the visual resources. Although these prescriptions also provide for uses such as livestock grazing and fuelwood harvest, it does not mean these uses will occur on every acre within the respective Management Areas. In fact, fuelwood harvest and livestock grazing opportunities will be minimal on the east slopes of the Huachuca Mountains.

3. Thank you for your support of the proposed recreation site development on the east side of the Huachuca Mountains. As you point out, these are long overdue for this fast growing area. Funds to improve the Carr Canyon Road can not be used to finance the recreation site development even if it were a good idea. The funds come from separate appropriations by Congress. The road improvement is needed regardless of the recreation site developments for safety and long-term maintenance reasons. See response number 4.

4. The intent of the improvements for the Carr Canyon Road is to give the public easier and safer access, and to make the road maintainable. Because of the steep grades on the road, it is very difficult and expensive to maintain a gravel surface on the road. Without the paved surface, the road is not maintainable for passenger cars. Even though the paving has a high initial cost, the long-term costs for maintenance and replacement of surfacing are much lower.

Agency response to
Ted R. Miller
(continued)

5. It is our intent that fuelwood and other Forest products be reserved for use first by U.S. citizens. In some instances, there clearly is no demand by U.S. citizens to utilize available products because of various reasons. For example, small limbs are often left behind by U.S. wood cutters while Mexican citizens are willing to utilize them. In no case would the harvest of fuelwood or other products exceed the supply that could be sustained over the long-term or be done in a manner where other resources would suffer.

0508

CORONADO N. F.

OCT 2 - '85

SEP 30 1985

ACTING
Phoenix Area Director

Review, DEIS and Forest Plan, Coronado National Forest (ER 85/1058)

Arizona State Director
Bureau of Land Management
State Square
3707 North 7th Street
Phoenix, Arizona 85014

1 On page 126 of the DEIS, at Chapter 4, "Environmental Consequences," mention is made of the plan to transfer a part of the Santa Teresa mountains to the San Carlos Apache Tribe. The statement that the Coronado National Forest is cooperating in this effort, however, is in error. There is, in fact, considerable controversy between the Tribe and the Forest Service on this matter, and the latter agency is fostering plans associated with the issue that will be detrimental to environmental quality.

2 The Forest Service is insisting that, as a condition of the land transfer, unlimited public access to the Santa Teresa Wilderness be granted. This access would be across Indian land, and yet no discussion of the environmental consequences was noted in the DEIS, particularly those impacting on the reservation. Such access would make archeological, historic, and other tribal resources much more available to those persons who illegally exploit them for profit. The Forest Service must address this issue. To do otherwise would be a violation of the National Environmental Policy Act, for failure to give adequate consideration to: (a) the transfer's cultural, social or economic effects on the San Carlos Apache Tribe or (b) the means to mitigate such effects.

Walter R. Mills

cc: Superintendent, San Carlos Agency
Chairman, San Carlos Apache Tribal Council
Joe Sparks, Tribal Attorney
Phoenix Field Solicitor
Coronado National Forest Supervisor
Deputy Assistant Secretary - Indian Affairs (Operations)
Attn: Chief, Environmental Services Staff
Code 204 - Room 4560N

Agency response to Walter R. Mills

1. By an agreement dated February 25, 1896, and ratified by the Act of June 10, 1896 (29 Stat. 360), the San Carlos Indian Tribe ceded to the United States approximately 232,000 acres of land designated as the San Carlos Mineral Strip in the southern part of the San Carlos (formerly the White Mountain Apache) Indian Reservation. Subsequently, on March 21, 1917, the President added a part of this to the Crook National Forest by proclamation. The Crook National Forest then became a part of the Coronado National Forest. The cession acceptance by Congress provided that the Tribe would be given any receipts from the "sale of mineral lands." These receipts have been very small and periodically during the past 50 years the Tribe has sought recovery of the land. The Tribe made a strong effort to acquire the land in about 1958-59. This was vigorously resisted by the livestock ranchers. In 1963, the Department of Interior attempted to compromise by reconveying the mineral rights in these lands to the Tribe. On the premise that the disposition of minerals in National Forest lands is a function of the Interior, the Department of Agriculture made no objection. The Order did stipulate that the Tribe would agree that extraction of the minerals would be subject to conditions adequate to protect the surface.

   In January, 1969, Secretary of Interior Udall signed an order (34 F.R. 1195) purporting to restore to the San Carlos Tribe of Arizona the surface rights to the San Carlos Mineral Strip. Of the 232,320 acres in the strip, about 10,650 are within the Coronado National Forest.

   This action was taken without the concurrence of the Secretary of Agriculture. The Department of the Interior received numerous letters and opinions over the years stating the Department of Agriculture's position that the return of the National Forest portion of the strip by order was not legal. However, by letter dated November 17, 1976, the Chief advised Senator Barry Goldwater that the Forest Service was "reviewing with representatives of the Department of the Interior the question of what administrative action can now be taken to affect the proposed transfer of the San Carlos Mineral Strip."

   The Forest Service maintains that the National Forest lands were not subject to the authorities under which the Secretary of Interior's Order was issued, and there is no other authority by which the Secretary of the Interior could legally transfer National Forest lands to the Tribe. The Secretary of Interior's action has created jurisdictional problems not yet resolved, despite many years of effort by the respective Departments. The primary issue needing resolution is public access to remaining National Forest and other public and private lands in the Santa Teresas. The jurisdictional question and final resolution must be made at the National level. During 1984 and 1985, the respective Departments have reviewed and worked on legislation to affect this land transfer.

   We disagree with the inference that the Forest Service is not cooperating in the effort to transfer the Mineral Strip portion of the Santa Teresa Mountains of the Coronado National Forest to the San Carlos Apache Tribe. We maintain the Coronado Forest has actively supported the land transfer. The Forest has met with the Tribe, the Tribal Chairman, the Bureau of Indian Affairs--San Carlos Agency Superintendent, and BIA area personnel as well as the Tribal Attorney on this matter. As a public agency we have the responsibility to insure public access to public lands. We have not insisted on "unlimited" public access, only on reasonable public access.

2. We believe access across a portion of the lands of the San Carlos Apache Reservation is the only reasonable way to reach the northeast portion of the National Forest System lands of the Santa Teresa Mountains regardless of the land in question. That access is open and has historically been open. We seek only to insure that access remains available not only to the Forest Service, but also to the public, who we believe have a right to the use and enjoyment of their lands.

COMMENTS

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

CORONADO N. F.
OCT 11 '85

0646

All comments must be received by the Coronado National Forest no later than

________________________.

Please print or otherwise write legibly - Thank you.

1 Comments: I am opposed to the proposed Astronomical development for Mt. Graham. I haven't been convinced that it is the best site available and I hate to see these mountain "islands of forest" gradually being taken up and closed to public use one by one. I think that in 15 years these proposed telescopes will be made ~~by~~ obsolete by space telescopes and the inevitable creep of light pollution. However, once the mountain is developed - a portion of it is gone forever.

2 Second, I am concerned about the closure of areas to motor vehicle travel. I believe that many persons are only able to enjoy the forests by vehicle and to close off a number of four wheel drive "trails", severely hinders their ability to get into the forests. I am in favor of limiting vehicular traffic to roads and tracks, but feel the enforcement of forest service rules as proposed would go too far.

Name: Kenneth Moeller

Date: 10/10/85

Address: 3004 N. Flanwill
TUCSON, AZ 85716.

Agency response to
Kenneth Moeller

1. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as it was for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

2. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit. Based on your comments, you seem to agree with this concept.

   The policy is not an attempt to "ban" ORV's or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. Approximately 70 percent of the Forest now provides the opportunity for some form of motorized recreation activity. (See Table 21, page 62, DEIS). Before any specific roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements.

   Signing or designation of roads or trails open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads or trails are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is much work yet to be done to sign all roads and trails. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off the road use of vehicles is not acceptable. Direct enforcement of the policy will have to be implemented in stages along with the signing.

   Regardless of a given vehicle management policy, we recognize there will always be some individuals who will disregard established regulations. Teaching responsible use of the National Forests and its resources is something every individual can assist us with.

0068

Gale Monson
8831 N. Riviera Dr.
Tucson, AZ 85704

18 Aug 1985

Supervisor
Coronado National Forest
Federal Building No. 42
300 West Congress
Tucson AZ 85701

Dear Sir:

With reference to the Coronado National Forest Plan DEIS, I wish to comment briefly on the proposed astrophysical observatory area on Mt. Graham.

1 First, let me say that I object strongly to the observatory proposal on any ecological or esthetic basis that you or I can conceive. The project is a boondoggle that simply cannot be justified. If the UofAZ astronomers must have the world's most powerful telescope to play with at mine and other taxpayers' expense, let them locate it somewhere else, Mt. Hopkins, for instance, where the damage has already been done. I utterly fail to see where peering into space any farther than astronomers have already peered is going to be of any value to the human race, now or in the future. Science for science's sake is certainly not to be denied wholesale, but in this instance things are going too far (no pun intended). Big telescopes are not holy cows.

2 Second, I am dismayed that you have incorporated the observatory in the DEIS, and not only that, you have given it the status of a Preferred Alternative. This gives it an aura of sanction by the Forest Service which to some people indicates an already justified project, which to me, at least, it is not. I feel that you had no good reason for treating it in the DEIS. Instead, it should be dealt with on a case by case basis, and not be dignified and its status blown out of proportion by putting it into a long range plan for the entire Coronado Forest.

1 I would be pleased to receive the Mt. Graham EIS. Thanks very much for the opportunity to comment on your DEIS.

Sincerely yours,

Gale Monson

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 20 1985
RECEIVED

Agency response to Gale Monson

1. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

2. Any proposal, including the Mt. Graham Astrophysical Area, must be subjected to an environmental analysis. Major proposals must be considered in the context of the entire Forest, therefore, it was appropriate to attempt to analyze the astrophysical proposal as part of the Forest Plan analysis. However, due to the timing, complexity, and controversy, we now have to deal with the astrophysical proposal in a separate analysis. The results of this separate analysis will ultimately be included in the Forest Plan.

   The Preferred Alternative did propose a level of astrophysical development that reflected the extent of our analysis, including public opinion, of the proposal as of the fall of 1984. The situation has changed considerably since the proposal was first publicized.

Gale Monson
8831 N. Riviera Dr.
Tucson, AZ 85704

FOREST SERVICE
Coronado National For
TUCSON, ARIZONA
OCT 1 - 1985
RECEIVED

0501

30 September 1985

R. B. Tippeconic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson AZ 85701

Dear Mr. Tippeconic:

1 Here are my comments on your Proposed Forest Plan (141 pages) and your DEIS (271 pages) and their supplementing maps. I do not know whether to complain to you about what seems to be a gross amount of superfluous and repetitive data which surely required a tremendous amount of gathering by your staff, or to compliment you on your ability to produce such a staggering amount of what are apparently accurate data regarding every aspect of administration of the Coronado National Forest.

2 The Proposed Forest Plan, or Alternative B, seems to be based on the RPA and NFMA, neither of which I am familiar with. I understand that, after public comments that you asked for, the Forest Service intends to pursue Alternative B. I feel that you want to proceed with this alternative unless forced to do otherwise by law. Despite assertions that public input is again desired, such input probably will have little impact on a course that you have already elected to follow. Nevertheless, I will comment, mostly adversely I fear, on some of your decisions that are objectionable to me and my family.

3 1. I see no adequate grounds for timber harvest on any of the Coronado. The small economic gains and questionable silvicultural benefits that would accrue are far outweighed by the good from leaving the trees stand for erosion control, wildlife and botanical benefits, visual quality, and esthetic and recreational value. I am fearful your plan will result in logging out the wonderful Douglas-fir and spruce trees in canyon bottoms and at canyon heads, a fine natural resource that should never be commercialized.

4 2. Why should livestock grazing be increased? It seems to me that many parts of the Forest are badly overgrazed already, and have been for years. I don't think you can increase the grazing capacity while at the same time you increase the permitted livestock use. It is not logical. In no case should livestock grazing be allowed where it does not exist presently. Grazing should not be permitted on the "alpine meadows" or cienegas of the high parts of the Chiricahuas and Pinalenos.

5 3. Please let's radically limit road building. Justification for new roads at public expense is weak at best. If it is necessary to build roads, close them when the need is past (I'm thinking of fuel wood harvest in particular).
6 As for repair and maintenance of existing roads, let's maintain them, but not expand them in any way. The Mount Lemmon Highway improvement should be limited to the existing roadbed, with no big cuts and ugly curve-straightenings. In my mind, such work would only make the highway more dangerous, permitting the present speeders to drive even faster. A few citations for speeding would do a world of good and be much less costly.

7 4. Apparently you have decided to abandon Mt. Graham to the astronomers. I think I object to this one thing more than I object to anything else in the Forest Plan. Why do you consider it cut-and-dried, and why have you accepted it as an already approved proposal? What rights do astronomers have that are superior to those of that part of the public which wants the mountain left alone (for esthetic reasons if no other)? Don't you consider the cost to the public of this extravagant proposal a valid objection? With the powerful telescope(s) in place, what good is it going to do anyone (aside from raising the adrenalin level in astronomers) to study objects in space that are millions of light years away and could have no possible effect on our galaxy that we could do anything about?

2 5. Why present any "Alternatives" than Alternative B, which is what you will put in effect anyway? The public should have been asked to comment on this only, without having the waters muddied by all the other "Alternatives" that will not be seriously considered by the USFS. These additional "Alternatives" only serve to add to the general confusion and do not reveal much that is clear-cut (if you don't mind my use of a popular silvicultural word). I recognize that it's too late to do anything about this now, but I thought you should know how at least one person thinks about this.

8 6. I applaud your proposed establishment of ZBAs, and would like to see more RNAs. I would like to know the rationale behind the statement "The Mt. Graham Wet Meadows do not represent vegetative types that are targeted for representation by the Coronado National Forest in the Regional Plan." 9 (Is the Regional Plan something set in concrete?) I would suggest that Chino Canyon on the west side of the Santa Ritas become a ZBA--witness the presence there of birds such as the buff-collared nightjar, the black-capped gnatcatcher, and the five-striped sparrow, plus the highly unusual hackberry grove and associated plant life.

10 7. Is dwarf mistletoe actually such a problem that it warrants control? Isn't it a part of the diversity of the Coronado National Forest? Remember its berries provide food to many birds, especially during severe weather.

11 8. I'm for all the wilderness you can stand, including all of the original
12 Mt. Graham Wilderness Study Area. As an aside, could you lay to rest for me the rumor that USFS "cut a deal" with the Wilderness Society whereby the latter would not object to the Mt. Graham observatory?

13 These are really only a few of the many comments I could make, but they are the most important ones to me. I hope their tone does not offend you. Overall, considering the magnitude and diversity of the challenges, I feel that until now the USFS has done an admirable job of managing the Coronado. I am somewhat concerned that in the USFS as a whole there lately has been a swing away from giving natural resources conservation the major attention, to a different attitude, that of considering economics and exploitation (in other words, $$$ for the cowman, the lumberman, the miner, etc.) as being more important. Let's remember to implement your statement, THE FOREST BELONGS TO EVERYONE.

Thanks for reading and considering this letter; best wishes for the next fifty years; and I hope that more of the public becomes interested in what the USFS does in the future.

P.S. It really is not necessary that you answer all my questions, nor do I expect you to.

Sincerely yours,

Agency response to
Gale Monson

1. We agree the Proposed Forest Plan and DEIS are imposing documents. The Plan was presented in detail to allow people the opportunity to provide substantive comments on the proposed management direction. The purpose of the DEIS was to present the alternatives considered for management of the Forest and to disclose the predicted environmental consequences. The significant comparisons between alternatives were summarized in Chapter 2 to help people make a choice. Material in the rest of the document was to meet legal requirements as well as provide additional detail where it was thought appropriate. The DEIS essentially summarized all the information used in the entire planning effort.

2. Alternative B does not represent the Proposed Forest Plan. The Preferred Alternative (Proposed Action) represented the Forest Plan. Alternative B was developed to respond to goals and objectives assigned to the Coronado National Forest as a result of National level planning done in 1980 under the Resource Planning Act (RPA) Program. The National Forest Management Act amended the RPA by requiring planning at the National Forest level and is the reason for our efforts at presenting the Proposed Plan and alternatives. More detail on this relationship can be found in the DEIS on pages 2 and 3.

   Your understanding of our intentions is incorrect. Alternative B was rejected as the Forest Plan because it is financially unfeasible as well as being the least responsive to many of the identified issues and concerns.

   All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

3. Timber harvest under the Forest Plan would be done for the very values you have stated. Maintenance of healthy stands of trees is essential to maintaining those values now and in the future. The silvicultural methods proposed for harvest call for establishing and maintaining a diversity of age classes, including mature and overmature trees up to 240 years. A diversity of tree densities is also prescribed. Refer to the management prescription for Management Area 2 in the Forest Plan.

Agency response to
Gale Monson
(continued)

4. No increase in current levels of livestock use is predicted in the proposed Forest Plan. Reported use in recent years has totaled about 400,000 AUMs. It is planned to decrease this use to 350,000 in the first period and 338,000 in the second period. Then, as the range responds to this decrease in use and the improved management practices, use will be allowed to follow the expected rise in capacity. After that point in the second period at which capacity and use are brought into balance, use will not be allowed to exceed capacity. If capacity does not improve as anticipated, the projected 360,000 AUM level will not be achieved. In any case, use for the foreseeable future will be about ten percent less than present.

   The Proposed Forest Plan does not provide for grazing any areas that are currently ungrazed, including the "alpine meadows" of the high parts of the Chiricahuas and Pinalenos.

5. The current transportation system is considered to be adequate for most anticipated uses. New road construction will be based on needs to meet specific resource management objectives. The Forest Plan predicts this need will be limited to low standard roads for wood harvest and mining activities. Approximately ten miles will be needed for wood harvest. We are unable to predict the need for mining but expect it to be minimal. Once a road is no longer needed for resource use or management, our intent is to close it either temporarily or permanently. Road management emphasis will be on maintenance and reconstruction of existing roads.

6. The proposed reconstruction of the General Hitchcock (Mt. Lemmon) Highway is for safety and maintenance needs. The road will be maintained as a scenic highway. It will be reconstructed within the existing alignment and to the existing standard of two lanes with a 30 mph design speed. A separate environmental analysis addressing site specific concerns for the road has been conducted. The analysis indicated use on Mt. Lemmon will not increase significantly due to the planned improvements. Use will increase as the result of population growth in Pima County and the surrounding area. The road is not the means by which to regulate or manage the users of the mountain. The highway is the means to transport all of the people safely to their destinations on the mountain.

   The Forest Service has considered other transportation alternatives for the mountain, and will continue to evaluate these. Neither the Coronado National Forest nor Pima County has the funding necessary to subsidize public transportation on Mt. Lemmon. Any alternative would have to be self supporting. Mt. Lemmon is very different from Sabino Canyon because there are private dwellings on Mt. Lemmon and because the road is a public highway. We do not have the options of closing this road or charging for use as we did in Sabino Canyon. No matter what transportation alternatives become available, the Mt. Lemmon Highway will be needed.

7. The Preferred Alternative did propose a level of astrophysical development that reflected the extent of our analysis, including public opinion, of the proposal as of the fall of 1984. Much new information, including public opinion, has become available since the proposal was first publicized. Any previous preferences in no way reflects a current position regarding Steward Observatory's current proposal. It will now be the subject of a separate EIS which will ultimately amend the Forest Plan. As such we now have no position.

   Your other comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS.

8. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the

Agency response to
Gale Monson
(continued)

Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types for this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out such special areas. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is National in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

The desirability of establishing an RNA or ZBA (wet meadows and/or spruce-fir) near the summit of Mt. Graham, within the proposed astrophysical development area will be addressed in the EIS now being prepared to evaluate the observatory proposal.

9. Designation of Zoological and/or Botanical Areas has been reserved for truly unique biological association. Many areas of the Coronado support plants and birds which are uncommon in much of the United States, and this is reflected throughout the prescriptions. We recognize Chino Canyon as a special kind of place, but did not feel that it was deserving of such a classification. Management activities in the area will be pointed at preservation of the values that you point out.

10. Although dwarf mistletoe may provide food to birds, it is also a parasitic plant that will kill living trees over a period of time. The control of mistletoe is necessary to maintain healthy and vigorous stands of trees. Control methods are normally integrated as a part of regular silvicultural treatments and not as a separate activity.

11. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

12. You may lay your rumor to rest. The USDA, Forest Service has made no "deals" with the Wilderness Society or anyone else regarding the Mt. Graham Wilderness Study Area or the proposed Mt. Graham Astrophysical Area.

13. Your comments do not offend us. We acknowledge your interest and concerns regarding management of the National Forests. We also appreciate the valuable assistance you have given the Coronado National Forest over the years.

Agency response to Mt. Graham Proposed Astrophysical Area Commentators

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the Draft EIS is released for public comment. The public comment period will last at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the Draft EIS.

The following is a list of individuals, agencies, and organizations commenting on the proposed Mt. Graham Astrophysical Area. In addition to these specific comments, numerous petitions were received for and against the proposal. The names on those petitions do not appear in this listing. They are available at the Coronado National Forest Supervisor's Office, Tucson, Arizona.

- Edward Abbey
- Scott Adams
- Warren Adams
- Beverly Alberding
- John Alcock
- Larry Allred
- Juanita Alvarado
- American Museum of Natural History
- American West Realty
- Howard & Helen Ames
- D. Renee Anderson
- Dennis L. Anderson
- Kathy Anderson
- James M. Andres
- Floyd & Irene Andrews
- Eldon & Avalon Angle
- Animal Defense Council
- Arizona Bureau of Mines
- Arizona Conservation Council
- Arizona Daily Star
- Arizona Daily Wildcat
- Arizona Department of Economic Security
- Arizona Game & Fish Department
  - Phoenix
- Arizona Game & Fish Department
  - Pima
- Arizona Game & Fish Department
  - Tucson
- Arizona Highway Department
- Arizona House of Representatives
  - Minority Staff, Mike Fronske
- Arizona House of Representatives
  - Representative Gus Arzberger
- Arizona House of Representatives
  - Representative David C. Bartlett
- Arizona House of Representatives
  - Representative William English
- Arizona House of Representatives
  - Representative Larry Hawke
- Arizona House of Representatives
  - Representative Jack B. Jewett
- Arizona House of Representatives
  - Representative Joe Lane
- Arizona Outdoor Coalition
- Arizona Public Service Co.
- Arizona State Land Department
- Arizona State Parks
  - Tanna Baldwin
- Arizona State School
- Arizona State Senate
  - Senator Burton Barr
- Arizona State Senate
  - Senator William Delong
- Arizona State Senate
  - Senator Greg Lunn
- Arizona State Senate
  - Senator John Mawhinney
- Arizona State Senate
  - Senator Ed Sawyer
- Arizona State Senate
  - Senator Robert Usdane
- Arizona Wilderness Coalition
- Arizona Wildlife Federation
  - Scottsdale
- Arizona Wildlife Federation
  - Tempe
- Arizona Wildlife Federation
  - Tucson
- Audubon - Huachuca
- Audubon - Maricopa
- Audubon - Tucson
- Mr. & Mrs. Clarence Bach
- David & Diane Balanoff
- Keith Bancroft
- Jefferey S. Barker
- C. Barner
- Brent Bassford
- Blaine C. Batcheld
- Joseph R. Bate
- Charles Bates, PH.D.
- Helene & Abe Beaupeut
- Elliot Bernshaw
- Steve Bingham
- Beverly Ann Black
- Jennefer Bond
- R. L. Bonham
- John & Florence Boyd

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Agency response to
Mt. Graham Proposed
  Astrophysical Area
  Commentators
  (continued)

Diane Boyer
P.R. & Margaret Brady
Jeffrey Brendecke
Brinkerhoff Realty, & Construction
  Spencer Brinkerhoff
Ms. Bonnie Briscoe
Sidney Brooks
James R. Brown
Martin H. Brown
Michelle Brown
Dennis R. Brownridge
Simean Brubaker
David Bruce
Mr. & Mrs. J. R. Brugman
Debbie & Bob Buecher
Larry Buhlk
Anthony Ray Buida
Bureau Land Management
  Safford District
Bureau Land Management
  Arizona State Office
Bureau Land Management
  Phoenix District
Glen Burgess
Jane & Clifford Burrows
Marina Busby
W. A. Calder
Canyon State Communications
V. Carpenter
Catalina Council
  Boy Scouts of America
Center for Astrophysics
Chamber of Commerce
  Safford
Chamber of Commerce
  Willcox
Larry J. Chapman
Helene Charbonneau
Bruce Chastain
Doug Christie
Eleanor Christman
Margaret G. Christman
Phil & Charlette Christman
Valerie Chun
Church of Christ
City of Prescott
City of Safford
City of Thatcher
City of Tombstone
City of Willcox
Alf Claridge
Eleanor Claridge
Barbara Clark
Gerald Clark
W. H. Clarke, Jr.
Susan Clarke-Cordero
John K. Clary
Farrell "Dutch" Clifford

Surcie R. Clonts
Sterling W. Clouse
Guy Cloutier
Coalition for the Preservation
  of Mt. Graham
Cochise Conservation Council
Cochise County Planning Dept.
Charles L. Colell
Columbine Summer Home Owners
Verna Colvin
Alice Combs
Cynthia R. Combs
Richard Conley
Marilee H. Conner
Laurel Cooper
Mrs. W. J. Cooper
Jim Coryell
Dennis Coules
Noel Cousins
Mr. & Mrs. William Cowan
George J. Coyne
Crary, Buchanan, Bowdish, & Bovie
  L. E. Crary
Sylvia Crisler
Emil Crockett
Martie Crone
Gary Curtis
Gayla & Dr. Kay Curtis
Mr. & Mrs. Bernard Curtis
Charlie Curtiss
J. Hall Cushman
Vernon Dale
Rudolph J. Dalpra
Dorothal S. Daniels
L. O. Daniels
Rudolf Dankwort
Mr. & Mrs. George Dankworth
E. D. & Martha Darrell
Jessie & Cecil Darrell
John C. David
Roger E. David
Floyd Davis
John Davis
Karen De Braal
C. W. De La Haussaye
Jon Deak
James & Rebecca Deatherage
Defenders of Wildlife
  Steve Johnson
Javier Delarosa
Department of the Army
  Ft. Huachuca
  Los Angeles
Department of Transportation
  Safford
Frances Dixon
Suzy Dodd
Mildred K. Doerges

Agency response to
Mt. Graham Proposed
Astrophysical Area
Commentators
(continued)

Natalie Danforth
Clyde W. Doran
James & Linda Dorrell
Thorpe Dresser
Mrs. Mary Rose Duffield
John Dunckee
Jack W. Dykinga
Christopher J. Earl
Earth First
Eastern Arizona Amateur Radio Society, Inc.
Eastern Arizona College Library
Frank R. Eaton
Mark Edwards
Mark Egger
J. H. Eikenberry
El Camino Community College District
Clifford Elkins
Sarah Elkins
Peter & Maiva Ertman
Harry Euyart
Mr. & Mrs. Walter Eyrich
Fairways Property Owners
John & Ann Edwards
Daniel E. Falla
Pam Fargo
Roberta Fargo
James E. Farris
Federal Aviation Administration
Bernie Fellz
Ed Fenn
Nancy Ferguson
First United State Credit Union
W. A. Kelsey
Don Fischer
James R. Fitzsimons
Joyce Flamm
Timothy J. Flood, M.D.
Food Conspiracy
K. W. Foote
Faye Forehand
Timothy Forker
Kay & Steve Forsythe
Fort Willcox Leisure Park
Charles R. Straud
Fort Worth Museum of Science & History, M. P. Walk
Patricia Fox
Ellis P. Franklin
Franklin & Marshall College
Michael A. Seeds
Warren French
Barry A. Friedman, M.D.
Allen E. Frye
Lourdes Fuentes-Williams
Frank Funk
David T. Gaffney
Susie F. Gale
Joanne Gallaher
The Galloways
Lucy Gander
Arlene & M. A. Garcia
Ben Gawlik
Mr. & Mrs. Ed Geare
Deborah Gearing
Roxane George
Clayton R. Gibson
Gila Communications
Gila Valley Economic Development Foundation
Wolfgang Golser
Betsy & Gene Gomez
Governor of Arizona
Honorable Bruce Babbitt
Venila Graham
Graham Conservation
Graham County Board of Supervisors
Graham County Coop Extension Service
Graham County Electric
Jack D. Prince
Graham County Florist & China Shop
B. Hustin
Graham County Wildlife
Carmen Oaks
Karla Graves
Bill & Mariam Groth
Alan L. Gruel
GTE Sprint Communications
National Real Estate
Karen & John Gunn
Eric C. Gustafson
H & R Men's Wear
Tedd Haas
David Hall
Deb Hall
Judy Hammerschlag
A. Hancock
Shirley A. Haralson
Garland Haraway
Michael Haraway
Jim & Reggie Harding
William L. Harrison
Harvard Smithsonian Center/Astro
David W. Latham, Assoc. Dir.
Paul Hathaway
Marian A. Hawk
Herbert Hawkes
Charles & Lisa Heidenreich
George H. Henry
C. J. Henson
Leslie Hickerson
Helen P. Hiemstra
Danell Higgs
Roger H. Hildebrand
Bruce Hilpert
John B. Hiott, Jr.

- Randal P. Hodge
- Mr. & Mrs. Dean Hodges
- William Hoffmann
- Ronald & Barbara Holden
- Clarice Holder
- Stanley Honanie
- Earl Horley
- George Horn
- Clydett Houser
- Joseph Howell, Jr.
- Huachuca Hiking Club
- Huachuca Precious Metals
  - Jefferey J. Kurtzeman
- Mr. & Mrs. E.D.D. Hubbard
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- Scott Hudson
- Alison Hughes
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- Ed Hunter
- Marvin & Leda Imel
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- Incotax Systems
- Mike Jakubal
- Jensen Insurance
- T. W. Jensen, M.D.
- A. A. & Evangeline Jernigan
- Theresa Jimenez
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- Blaine K. Johnson
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- John & Ruth Johnson
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- Michael T. Johnson
- Wayne Johnson
- Johnson Family
- Johnson Motors
- Dale Jones
- Gary & Michelle Jones
- Kim Jordan
- Martin M. Karpiscak,
  - Office of Arid Lands
- KATO
- Mike Katzorke
- Desmond Kearns
- Sandy Kempton
- Rabbi Mathew Kent
- Louise Kentzle
- John Kessler
- Edward Klohe
- Douglas Koppinger
- Alex Kory, Jr.
- Karl & Deanna Kreiling
- David Kuck
- KXKW FM
- LAB Ornithology
- Mr. & Mrs. James Landon
- Bob Langsenkemp
- R. J. & C. B. Lansky
- Helen Laphan
- Pat Larson
- Charles T. Larue
- Elizabeth Laszlo
- Ken A. Laue
- David Lawrence
- Floyd Le Fever
- Mr. & Mrs. R. E. Lee
- Roxanne L. Lee
- Arthur O. Lehto
- K. E. Lemon
- Lawrence Lesko
- Tex Liddle
- Life Zones Corporation
  - Dan Elder
- Richard Lines, D.D.S.
- Diane Link
- G. Robert Lofgren
- Lone Mountain Ranch
- Mr. & Mrs. William Long
- Longbow Shooters Digest
- Edward M. Lousdale
- Lowell Observatory
  - Arthur A. Hoag
- Lucky's Saddlery
  - Lucky Platt
- Victoria L. Lunda
- Walter Lundquist
- Carol & Allen Luttschwager
- M & M Hardware
  - Larry Bush
  - Cathy M. Brown
  - Danny Camargo
  - Matthew J. Kreymer
  - Mr. & Mrs. Maloy
  - Marie Morales
- Carl & Kate Maass
- The MacDevitts
- James C. MacDonald
- Glen MacDougall
- Doris Mace
- Mr. & Mrs. E. L. MacFarlane
- Diane Madden
- Alyce Mahan
- Jim Malusa
- George & Shirley Manes
- Dick Marlow
- Eileen Marquez
- Carl W. Martin
- Francis Martin
- Richard J. Martin, M.D.
- Mr. & Mrs. William Masland
- Harold F. Mason
- Nathan & Adam Mason
- George D. Massey

Agency response to
Mt. Graham Proposed
  Astrophysical Area
  Commentators
  (continued)

Matlock Gas
Steve Mattan
Mr. & Mrs. Roy Mattson
Max-Planck-Institute
  Radio Astronomy
Mike Mayer
Mr. & Mrs. Jay B. Mayes
Tommy L. Mayhew
Mike Mazoyen
Florence McCann
Brian McClelland
Hugh McCracken
Alice B. McDonald
McGlocklin Ford
  William R. McGlocklin
Matt McWenie
Al & Deborah Meckler
Paul S. Meckler
Edie Merling
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Scott J. Mervin
Mr. & Mrs. Benson Meservey
Robert & Sarah Metz
A. Ellinor Michel
Forrest Miller
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Gale Monson
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Jack Morgan, Jr.
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Motorola Inc. - Tempe
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Julie Osborn Murphy
National Science Foundation
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Jeffrey Nay
Dr. J. Melvin Nelson
Jaquiline Newlove
Judy Newton
Karen & James Nickell
Karen Nickey

Julie Niles
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Muriel Noon
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Jim & Mary Jo Officer
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  Department of Astronomy
Peter Olar
Don & Nancy Olson
Dr. Robert Ohmart
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Observatory Astrofisico Di Arcetri
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Mr. & Mrs. Kenneth Palmer
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Gina Pancoast
David Patts
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Ray Payne
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J. R. Pellowski
Jack & Diane Pemberton
Pena Blanca Res.
Pennsylvania Club
Anthony & Susan Penrod
James E. Perkins
Anthony Perlitis
John Perry
Neil Petersen
Dr. Norman C. Peterson
H. B. Peterson
Mary Peterson
Tom Peterson
Bill Pfigler
Phelps Dodge Corporation
  C. F. Arnold
  E. M. Schern
Dale Phillips
David Phillips
Howard L. Phillips
Phoenix Main Library
  Tim Marshall
Paul & Cynthia Pierce
Walter Pierce
D. L. Pierson
Pima County Coop Extension Service
Pine Canyon Methodist Camp
Earl Pingry
PIP
Richard Plage
Geoffrey Platts
John & Karen Pluth
James E. Posedly
Jeff Price

Agency response to
Mt. Graham Proposed
Astrophysical Area
Commentators
(continued)

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William J. Priest
William Pritchard
C. Robert Pursley
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Dr. Grant Pyrah
Marilyn & Jeff Quinnell
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Donald Reeve
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Scott Reeves
Kim D. Reynolds
Stan Rheinfelder
Mr. & Mrs. Raymond D. Rice
Tim F. Rice
Michael Richardson
Andre E. Richmond
Larue Ridgeway
Rifle & Pistol Association
Norma Lee & Jim Riggs
R. R. Ritter
Luis Rivar
Mrs. S. Robb
Sidney D. Robb
Jack Robert
Don & Joyce Roberts
Mr. & Mrs. Cliff Roberts
Marilyn Robinson
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Leighton H. Rockafellow
Robert Rodriguez
Katie & Gary Roedl
Jesse K. Rogers
Mr. & Mrs. Walter T. Rogge
Jeffrey P. Ronstadt
Everett & Jane Rothrock
Mr. & Mrs. V. M. Roudebush, O. D.
Annabell Rufener
Rural Housing Development Assoc.
  Mary D. Stafford
Bruce Russell
Rick Sacks
Safford City Government
Safford Public Library
C. T. Saidley
San Carlos Apache Tribe Council
Sandia Motel
Brian Schar
John & Mary Schlotfield
Ellen F. Schmidt
Ron & Irene Schmoller
Peggy Jo Schroder
Kenneth Scott

SEAGO - Jim Reents
Lois Seibel
Alice Sevy
Doug Shakel
John Shaver
Barbara Sheldon
Addie Shelton
William G. Shilp
Randy W. Sholl
Anita Shurtz
Rex Shurtz
Sierra Club - Paul Hirt
Sierra Club - Southwest Office
L. L. Sigman
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Christine Smith
Glenn S. Smith
Mr. & Mrs. Robin Smith
Rosemary Smith
Vera & Eldon Smith
Fred & Virginia Smithson
Hermon Snootch
Joe & Gladys Snyder
P. Sonneborn
Southern Arizona Environmental Council
Southern Arizona Hiking Club
Southern Arizona Sportsman & Gun Club
Southern Arizona TV Station
Southern Pacific Transportation
Southwest Forest Industries
  Robert Stermitz
Jerry Stadley
Bud Stanford
Stanlee Company
State Farm Insurance
  Jim C. Johnson
Gary W. Steffens
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Joel R. Stine
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Stephen C. Stults
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Gary Szczepanski
President Tio A. Tachias
Mr. & Mrs. Don Ernest Taylor
Thella Taylor
Elizabeth Tea

Agency response to
Mt. Graham Proposed
Astrophysical Area
Commentators
(continued)

- Aregai Tecle
- Carol Ann Telander
- Tracy Tenney
- Thelma Terry
- Ray Thiessen
- Dave & Juli Thomas
- Mr. & Mrs. Donald Thomas
- Bruce K. Thompson
- Gary Thompson
- Ray Thompson
- Burl Thornton
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- H. E. & W. S. Tolman
- Tucson 4 Wheelers
- Tucson Public Library - Main
- Tucson Public Library
  - 22nd Street Library
- Tucson Rod & Gun Club
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- Turkey Flat Summer Home Association
  - V. & S. Perry
  - Ivan & Eva Shiflet
- Mr. & Mrs. E. R. Twitty
- Kenyon & Leona Udall
- Bobby Ulich
- Joan P. Ulrich
- United Farm Real Estate
- United States House of Representatives
  - Honorable Jim Kolbe
- United States House of Representatives
  - Honorable Morris K. Udall
- United States Senate
  - Honorable Dennis DeConcini
- United States Senate
  - Honorable Barry Goldwater
- University of Arizona
  - Christopher J. Corbally, S.J.
  - Dr. David King
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  - Dr. William Shaw
  - S. Somme
  - Peter A. Strittmatter
  - Dr. Ervin Zube
- University of Massachusetts
- University of Texas
- Charles W. Upsal
- U.S. Department of Justice
  - U.S. Border Patrol
- U.S. Environmental Protection Agency
  - Region IX
- U.S. Fish & Wildlife
  - Gilbert D. Metz
- USDA - Deschutes National Forest
- USDA - Soil Conservation Service
- USDI - National Park Service
  - Saguaro National Monument
- Val Nutrition
- Val Telephone Company
- Valley National Bank
- George E. Valley, Jr.
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- Sterling Vinson
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- Jerry Voul
- Don Wagner
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- Walneck's, Safford Sewing Center
- Paul & Margaret Walsh
- Eva Betty Washburn
- Washburn Observatory
- Terry Waters
- James P. Weaver, M.D.
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- Frank Welsh
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- Wesleyan University
  - J. Lortyz & C. Moore
- Glenn & Jane West
- Westar Development
  - Robert Shelton
- Ralph & Barbara Westerfield
- Western Forest Industry Accociation
  - Wayne Gaskins
- Betty M. White
- Willard S. White
- James & Ruth Whitmer
- George Whittom
- Wilderness Society
- Willcox-San Simon NRCD
- J. T. Williams - Smithsonian
- Mr. & Mrs. J. D. Williams
- Marie & Mary Williams
- Ted Williams
- Daryl Willmarth
- Cheryle Wilson
- Harold & Loriane Wilson
- Jim Wilson
- Marlene J. Wilson
- Barbara Wing
- Dennis M. Wonders
- Catherine A. Wood
- Mr. & Mrs. Wayne Woods
- Bailey Woods, Jr.
- Jim Worthan
- John Yurling
- Rev. Anne L. Zapf
- Ena A. Zent
- Gabriel Zinsli

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MT. GRAHAM CONSERVATION PROJECT
1902 FARGO DRIVE
SAFFORD, ARIZONA 85546
(602) 428-0508

Oct. 10, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
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MR. ROBERT TIPPECONNIC
Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic:

1 This letter will express some general comments on the proposed Coronado National Forest Plan. We understand the entire Pinaleno mountain section is withdrawn from consideration at this time pending release of the separate draft Environmental Impact Statement. It is the policy of the Mt. Graham Conservation Project to withhold specific comment on the Pinaleno section of the Coronado until the Astrophysical Research Area DEIS has been studied.

The question of the appropriate time to comment on the Mt. Graham Wilderness Study Area has also been confused. As it is tied to the outcome of the Astrophysical Research Area proposal, we will also withhold comment on the Mt. Graham wilderness issue except to encourage continued interim management of the WSA. It can be stated at this time, however, that the Mt. Graham Conservation Project supports maximum Wilderness possible for the Pinalenos, including any roadless acreage preempted by the observatory proposal. In keeping with that direction, we encourage the Forest Service to restudy any non-designated roadless areas for wilderness consideration, pursuant to the "release" language of the 1984 Arizona Wilderness Act. Such additional acreage should be added to the existing WSA and presented as a reasonable alternative in the forthcoming Mt. Graham DEIS. No decision on the Mt. Graham Wilderness should be made until after resolution of the observatory proposal.

2 The Mt. Graham Conservation Project is also concerned with the protection of other roadless areas within the Coronado. We strongly urge the Forest Service recommend the maximum Wilderness acreage for the Bunk Robinson and Whitmire Canyon WSA's in the Peloncillos. This must include the adjacent BLM additions of Baker Canyon and Guadalupe Canyon. It is beyond the scope of this project to comment specifically on the many outstanding features of the Peloncillos which qualify them for protection. These features have been enumerated by others and it is readily apparent that the wildness of the range and its uniqueness rivals the Pinalenos. The Peloncillo

2 Mountains meet all criteria and should be afforded full Wilderness protection befitting them.

3 The emphasis of the Coronado planning process as it relates to all sections as well as the Pinalenos should remain on recreation and wildlife habitat. These should be the primary focal points and determining factors in guiding all land management decisions now, and in the future. In all cases, however, wildlife habitat preservation and environmental quality protection should take precedence over recreational needs. With the exception of the "Management Options For Proposed Mt. Graham Astrophysical Site" as presented in Table 2 in the current DEIS, alternative "D" is the most acceptable of all options presented and best reflects these goals.

4 One item of special significance which has been overlooked by the Coronado planning process is the inclusion of Spotted Owl Management Areas (SOMA's) as a tool in land use decisions. The precedents set by other National Forests including the Klamath and Coconino should be studied and continued in applicable areas of the Coronado including the Chiricahua and Pinaleno sections. The Coronado SOMA's would, of course, relate more specifically to proposed development activities rather than timbering.

5 Another wildlife issue of concern is the recent discovery of elk in the Pinalenos. The forthcoming Mt. Graham DEIS should thoroughly assess the impact of increased human activity and disturbances on the herd due to the proposed Mt. Graham International Observatory. Such a study must include an analysis and projection of the size and viability of the population and its habitat needs. All questions arising from the addition of another significant big game species to the unique setting of Mt. Graham have to be resolved in light of the proposed astrophysical development. What the future impact of the elk itself will be on the associated ecosystems in this regard is of particular concern if it is a breeding population. Will there be competition with the black bear for food sources? How the herd should be managed for harvest in conjunction with forest habitats should be projected by Arizona Game and Fish Department personnel, as well as other unknowns such as seasonal paths of migration.

The possible interference of observatory development on elk hunting uses of the National Forest should be considered. The revelation of the elk presence on Mt. Graham underscores the extreme significance of the rich and special habitats found in the Pinalenos and the necessity of conserving Mt. Graham for its natural uses and preventing any spoiling or increased intrusion by man.

6 The most significant issue facing the Santa Catalina section is the proposed Hitchcock Highway improvement. It is obvious to the Mt. Graham Conservation Project that the improvement

6 should not be undertaken without a full EIS. All visitor carrying capacities of trails and recreational sites and the impact of increased use due to the improved road should be assessed before any improvement begins. Similar parallels relating to increased winter use of Mt. Graham due to snowplowing the Swift Trail can be drawn.

7 Finally, the importance of recommending all proposed Research Natural Areas for official designation as such must be stressed. These include Canelo, Pole Bridge addition, Scotia Canyon, Sunnyside Canyon, Lochiel, Sycamore Canyon extension, Pine and Ramanote Canyon, and Ramsey Canyon. All qualify eminently and should be protected. Similarly, full acreages as proposed under alternative "D" should be recommended for all proposed Zoological-Botanical Areas.

This brief overview of the Proposed Coronado National Forest Plan highlights only some of the more major concerns. Thank you for the opportunity to comment.

Sincerely,

WAYNE F. WOODS

Ann H Woods

ANN H. WOODS
Coordinators

WFW, AHW: aw

xc: Mr. Cecil Sims, Safford District Ranger

Agency response to Mt. Graham Conservation Project

1. Management decisions for the Pinaleno Mountains are being made for all areas not directly affected by the proposed Mt. Graham Astrophysical Area. The only area directly affected is the 3500 acres originally proposed by Steward Observatory. Management direction for this entire 3500 acre area will be addressed in the Mt. Graham Astrophysical EIS. That EIS will contain a range of development as well as nondevelopment options, including wilderness for roadless areas within the 3500 acre area. Standards and guidelines developed from the analysis documented in the Mt. Graham Astrophysical EIS will be incorporated in the Forest Plan when the decision on land use for the 3500 acres is made.

   The allocation decision for the Mt. Graham Wilderness Study Area is being made in the Forest Plan. The Forest Plan was revised to recommend wilderness for all 62,000 acres of the WSA. Our analysis and public comment now indicates there are no conflicts between this wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Roadless portions of the Pinaleno Mountains outside the WSA were not considered for a wilderness option.

2. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA would not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by the proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

Agency response to
Mt. Graham
Conservation
Project
(continued)

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through the management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private lands within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

4. The need for designating Spotted Owl Management Areas (SOMAs) on other National Forests, including the Klamath and Coconino, results from the extensive areas suitable for timber production. The timber management prescriptions for the Coronado National Forest are designed specifically to enhance wildlife habitat. An old growth component (240 years) is an integral part of the silvicultural prescriptions. The timbered acres suitable for harvest (13,729) on the Coronado N. F. represent only 45 percent of the coniferous forest types not already in wilderness. Therefore, we do not think there is a need to designate separate management areas for spotted owls.

   The question of impacts from the proposed astrophysical area on the spotted owl and other wildlife species will be addressed in the EIS for that specific proposal.

Agency response to
Mt. Graham
Conservation
Project
(continued)

5. A small number of elk have been seen on the Pinaleno Mountains (Mt. Graham). These elk apparently came from herds already established on nearby Indian Tribal lands. The impacts to other resources and uses from the elk and impacts to the elk themselves will be determined as more information is known about their intentions to stay on the Mountain. Part of this assessment could be determined in the EIS for the proposed Mt. Graham astrophysical area.

6. The proposed reconstruction of the General Hitchcock (Mt. Lemmon) Highway is for safety and maintenance needs. The road will be maintained as a scenic highway. It will be reconstructed within the existing alignment and to the existing standard of two lanes with a 30 mph design speed. A separate environmental analysis addressing site specific concerns for the road has been conducted. The analysis indicated use on Mt. Lemmon will not increase significantly due to the planned improvements. Use will increase as the result of population growth in Pima County and the surrounding area. The road is not the means by which to regulate or manage the users of the mountain. The highway is the means to transport all of the people safely to their destinations on the mountain.

   The Forest Service has considered other transportation alternatives for the mountain, and will continue to evaluate these. Neither the Coronado National Forest nor Pima County has the funding necessary to subsidize public transportation on Mt. Lemmon. Any alternative would have to be self supporting. Mt. Lemmon is very different from Sabino Canyon because there are private dwellings on Mt. Lemmon and because the road is a public highway. We do not have the options of closing this road or charging for use as we did in Sabino Canyon. No matter what transportation alternatives become available, the Mt. Lemmon Highway will be needed.

7. Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

   We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

   It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

   Zoological and/or botanical areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the Plan, and others were considered as suggested by various respondents.

COMMENTS

0677

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 7 - 1985

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Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than ____________________.

Please print or otherwise write legibly - Thank you.

Comments: I have reviewed your proposals for the ZBA and other changes in management for the South Fork of Cave Creek. I own part-interest in one of the two recreation residences. Not understanding all the ramifications of the watershed, etc., I shall only comment on area for which I have strong opinions and

1 feelings: I think speed limits and/or speed bumps are good; campground use should continue to be for day AND night use and for the general public; footpaths for hikers should be expanded; the ZBA should be "up and away" from the camping/recreation areas; parking and sanitary facilities should be expanded; hunting and fishing controls are appropriate; use fees are appropriate. These are public lands and should be managed to accomodate and welcome the general public -

Name: Doyle Mullican

Date: Oct 5, 1985

Address:

NOTE NEW ADDRESS:
P O. BOX 9653
AMARILLO, TEXAS 79105-9653

Agency response to Doyle Mullican

We agree public lands should be managed to accommodate and welcome the general public.

Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

COMMENTS

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

0682

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 7 - 1985

RECEIVED

All comments must be received by the Coronado National Forest no later than 10-11-85.

Please print or otherwise write legibly - Thank you.

Comments: I Am in Favor of THE "Proposed Action" in every aspect, except one. I Feel like the South Fork Campground Should be open for night use also. It seems to me that the NATIONAL Forest Service could arrive at a "Vehicle control" solution for the campground and still leave this site open for overnight use. I am a part owner in one of the two residences in South Fork and, at times, we have numerous family members and/or friends who wish to spend several days in South Fork. Our cabin will not always accomodate everyone; therefore, leaving the campground open for overnight use is very logical and feasible for our needs.

Name: Mary Mullican

Date: 10-3-85

Address: 2408 S. Ong
Amarillo, Tx. 79109

Agency response to Mary Mullican

Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

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